

# Public Document Pack



**TRAFFORD  
COUNCIL**

## **AGENDA PAPERS FOR LICENSING SUB-COMMITTEE**

**Date: Monday, 11 December 2023**

**Time: 10.00 am**

**Place: Committee Rooms 2 & 3 Trafford Town Hall, Talbot Road, Stretford,  
Manchester, M32 0TH**

<b>A G E N D A</b>	<b>PART I</b>	<b>Pages</b>
1.	<b>APPLICATION FOR REVIEW OF AN EXISTING PREMISES LICENCE - O2 VICTORIA WAREHOUSE, TRAFFORD PARK ROAD, TRAFFORD, M17 1AB</b>	
	Additional information received – Trafford Council.	1 - 68

**SARA TODD**  
Chief Executive

### Membership of the Committee

Councillors D. Jarman, B. Brotherton and J.D. Newgrosh.

### Further Information

For help, advice and information about this meeting please contact:

Miss Natalie Owen, Governance Officer  
Tel: 0161 912 4221  
Email: [natalie.owen@trafford.gov.uk](mailto:natalie.owen@trafford.gov.uk)

This agenda was issued on **Friday, 8 December 2023** by the Legal and Democratic Services Section, Trafford Council, Trafford Town Hall; Talbot Road, Stretford, Manchester, M32 0TH

This page is intentionally left blank

Before a Licensing Sub-Committee of Trafford Council

In the matter of:

A Review of the Premises Licence Number PLOOO631

and

The O<sub>2</sub> Victoria Warehouse

---

First Statement of Alison Acton

---

1. I am Alison Acton and am an Environmental Health Officer and I am authorised by Trafford Council to make this statement on behalf of Environmental Health in its capacity as a responsible authority.
2. My statement in relation to an application for the review of the premises licence held by Academy Music Limited in respect of the O<sub>2</sub> Victoria Warehouse.
3. On the 7<sup>th</sup> November 2023, I attended an appeal hearing about a prohibition notice served on Academy Music Group Ltd and Live Nation (Music) Uk Ltd. The reason for the appeal was they wanted the notices which had been complied with, withdrawn. This is not normal practise and demonstrates a lack of willingness to accept they had an issue. Evidence is to be exchanged and a further hearing held on this matter. All premises have historical data which is used as part of the requirement to consider ongoing compliance and suitable actions to take.
4. The prohibition notice was to provide a comprehensive assessment of the first floor loading including a detailed analysis that takes into account dynamic loading resulting from crowd movement as there could be a risk of overloading and collapse. There had not been any such assessment before this time.
5. On the 29<sup>th</sup> November 2023, I carried out a visit to O2 Victoria warehouse accompanied by some officers from regulatory services team. The purpose of this visit was to look at the compliance with an improvement notice served by myself in relation to event specific risk assessment. The improvement notice was to provide a suitable and sufficient site specific and event specific risk assessments, as far as reasonably practicable, the health, safety and welfare of employees, sub-contractors, volunteers and spectators, that they are not exposed to risks arising from the operation of events.

6. The guidance given was that -This should include, but not limited to

- Venue Suitability / Design
- Resilience activities for events (contingency & emergency planning)
- Medical plan / assessment
- Communications
- Transport management
- Working at height
- Temporary demountable structures
- Fire safety
- Electrical safety
- Barriers and Fencing
- Crowd management/demographic
- Special Effects
- Amusements
- Waste management
- Noise
- Toilet facilities
- Information & Welfare
- Food, drink & water provision
- Pyrotechnics- special effects
- Dealing with Crime and Disorder
- Working with Regulatory Bodies
- Worker Welfare
- Accessibility
- Counter Terrorism
- Licensing of Events

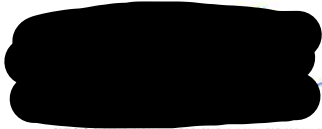
7. I was looking at the compliance of the documents which had been produced and comparing them to the actual activities at the event.

8. Matters identified in statements of Graeme Dixon and Nicola Duckworth identify gaps with the implementation of the policies and procedures sent to support the groups compliance with the improvement notice.

### Statement of Truth

9. I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Dated 6<sup>th</sup> December 2023



Alison Acton



**Filed on behalf of:** Applicant

**Witness:** N Courtney

**No. of Statement:** First

**Date of Statement:** 30/11/2023

**Exhibit(s):** NC1-NC8

**IN THE MATTER OF S.52 OF THE LICENSING ACT 2003**

**B E T W E E N**

**TRAFFORD BOROUGH COUNCIL**

**APPLICANT**

**AND**

**VICTORIA WAREHOUSE**

**RESPONDENT**

---

**WITNESS STATEMENT OF NEILL COURTNEY**

---

**INTRODUCTION**

1. I am the above named person and I am employed by Trafford Council as the Community Safety and CCTV Team Leader
2. My role is to manage the Community Safety Team and to address matters of crime, nuisance and anti-social behaviour in the borough. I am also responsible for the CCTV team who operate the public space surveillance system which is staffed by Trafford Council Officers.

3. As a result of this role I have access to Trafford Council's CCTV system and am authorised and trained in accessing, reviewing and storing CCTV footage captured by this system. I have completed a Security Industry Authority Training Course in respect of the operation of such systems.
4. On 30/11/2023 I was on duty and in the CCTV control room when I was contacted by Greame DIXON, an Environmental Health Officer employed by the Council. Mr. DIXON asked me if I would review CCTV footage from Camera Number 1001 which is a high definition, pan, tilt, zoom device installed at the intersection of Trafford Wharf Road and Trafford Road. Victoria Warehouse is located immediately adjacent to this camera. The camera is in its normal zoom and focus and not zoomed in on any persons or vehicles and is in its normal resting position.
5. I commenced my review of the footage obtained from this camera, beginning at 2225 on 29/11/2023. The camera was facing Trafford Road at the time. The camera shows that the junction of Trafford Road and Trafford Wharf Road has been closed with a series of traffic cones being in place to enforce this closure. There are two persons in high visibility jackets and trousers manning this closure.
6. At 22.26.36 the camera shows a black Hackney Carriage style vehicle drive up to the line of cones where one of the persons manning the closure approaches the vehicle and immediately moves one of the cones to allow this vehicle ingress into the closed area. I have captured a screenshot of this activity in the form of a still photograph and I produce this photograph as exhibit NC1.
7. At 22.35.15 another Hackney Carriage vehicle bearing advertising livery drives up to the cones and the cones are again removed and the vehicle is permitted access



through the cones onto the closed area. I have captured a screenshot of this vehicle passing through the cones and produce this screenshot as Exhibit NC2.

8. At 22:38.00 a white van approaches the cones and again, the member of staff in the high visibility clothing removes the cones and grants the van access to the closed area. This vehicle does not have the appearance of being a Hackney Carriage or Private Hire vehicle.
9. I have taken a screenshot of this vehicle entering the closed area and produce same as exhibit NC3.
10. At 22:38.53 a black Hackney Carriage vehicle approaches the line of cones and is granted access to the closed area of the road, this time on the wrong side of the road, in the face of both oncoming traffic. I produce a screenshot of this as NC4
11. At 22:39.10 a red private car is permitted access through the cones. I produce a screenshot of this as NC5.
12. At 22:39.53 a Hackney Carriage style vehicle is permitted access by way of the member of staff moving the cones. A screenshot of this is produced as NC6. It is clear from this part of the footage that not only has the vehicle been permitted access but it has been so permitted in the face of a green traffic signal directed toward the oncoming traffic and the vehicle is permitted access on the wrong side of the road, placing it in the position of directly facing oncoming traffic who have a green traffic signal.
13. At 22:41.13 a single decker bus, bearing the logo "Diamond" is permitted to exit the closed section of the road via the coned intersection and again the cones are moved out of the way. I have recorded a screenshot of this and produce same as NC7.

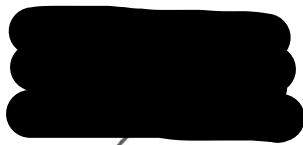
Following this vehicle are two Hackney Carriage vehicles which are also permitted egress.

14. I have downloaded the video footage from the series of incidents which I have placed on a pen drive. I produce this as NC8 I have provided NC8 to Mr. DIXON to assist with his investigation.

15. I confirm that my viewing of the CCTV footage was limited to the time period requested and carried out in accordance with the Surveillance Camera Code of Practice.

16. I believe that the facts stated in this statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed:

A large black rectangular redaction box covering the signature of the person.

Position: Community Safety and CCTV Team Leader

Date: 30/11/2023

**IN THE MATTER OF S.52 OF THE LICENSING ACT 2003**

**B E T W E E N**

**TRAFFORD BOROUGH COUNCIL**

**APPLICANT**

**VICTORIA WAREHOUSE**

**RESPONDENT**

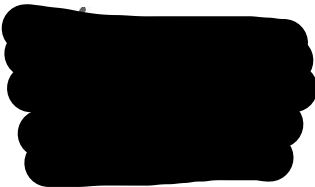
---

**EXHIBIT NC1**

---

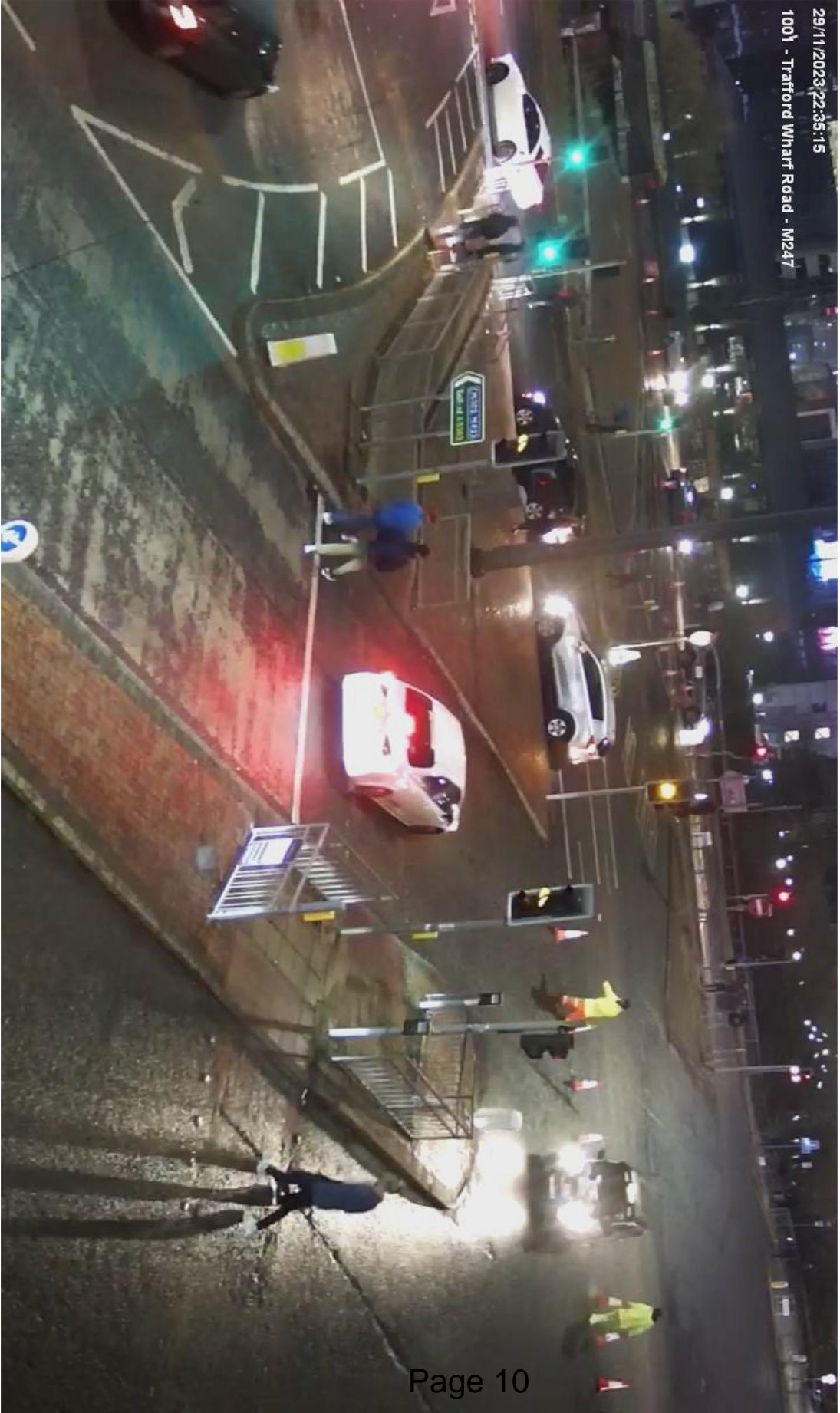
I verify that this is the exhibit marked NC1 in my statement.

Signed:

A large black rectangular redaction box covering the signature of the respondent.

Dated 30/11/2023

29/11/2023 22:35:15  
1001 - Trafford Wharf Road - M247



**IN THE MATTER OF S.52 OF THE LICENSING ACT 2003**

**B E T W E E N**

**TRAFFORD BOROUGH COUNCIL**

**APPLICANT**

**VICTORIA WAREHOUSE**

**RESPONDENT**

---

**EXHIBIT NC2**

---

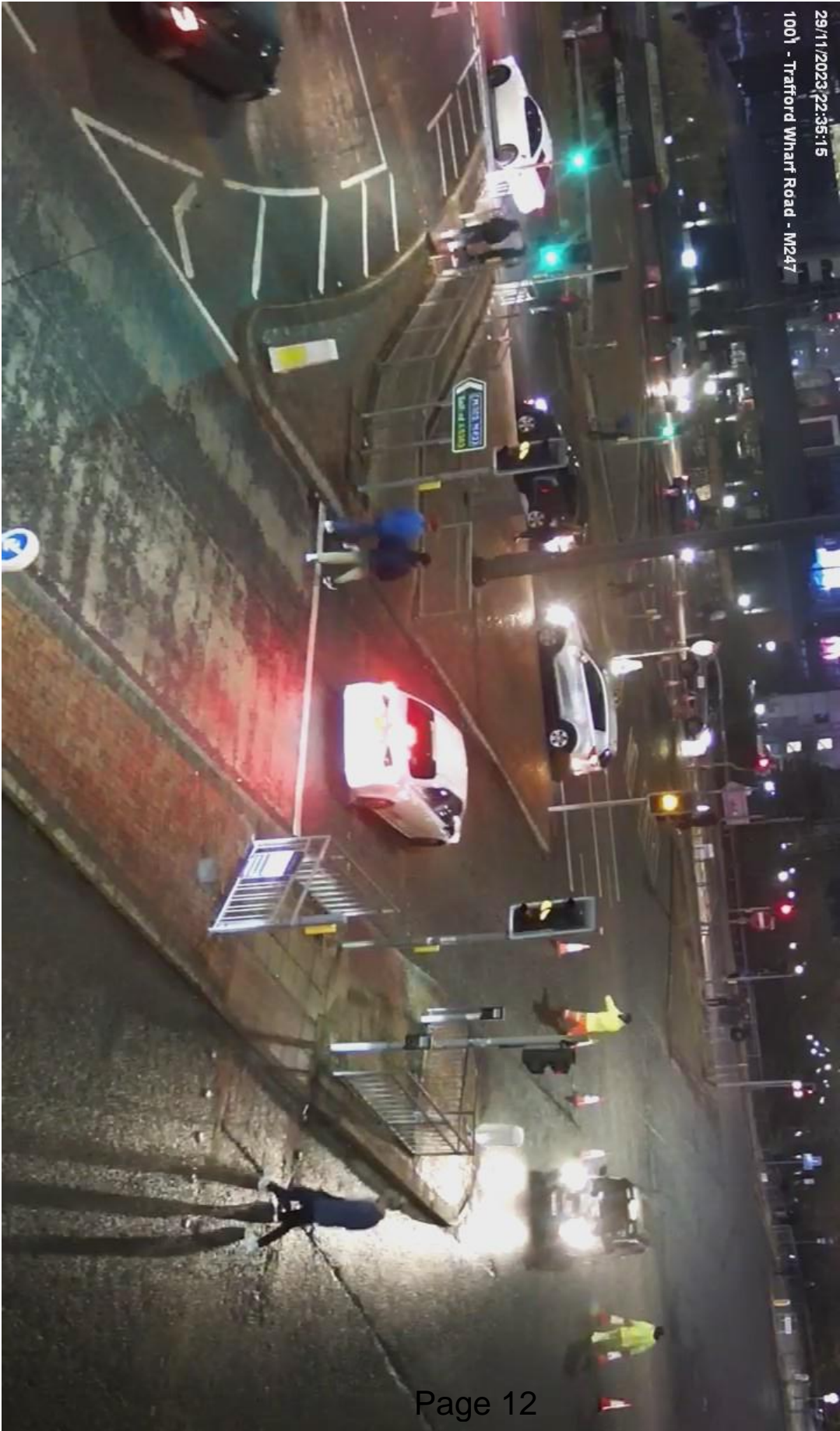
I verify that this is the exhibit marked NC2 in my statement.

Signed:

A large black rectangular redaction box covers the signature area, obscuring the name and any handwritten notes.

Dated 30/11/2023

29/1/2023 22:35:15  
1001 - Trafford Wharf Road - M247



**IN THE MATTER OF S.52 OF THE LICENSING ACT 2003**

**B E T W E E N**

**TRAFFORD BOROUGH COUNCIL**

**APPLICANT**

**VICTORIA WAREHOUSE**

**RESPONDENT**

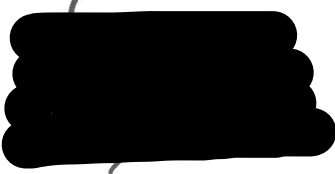
---

**EXHIBIT NC3**

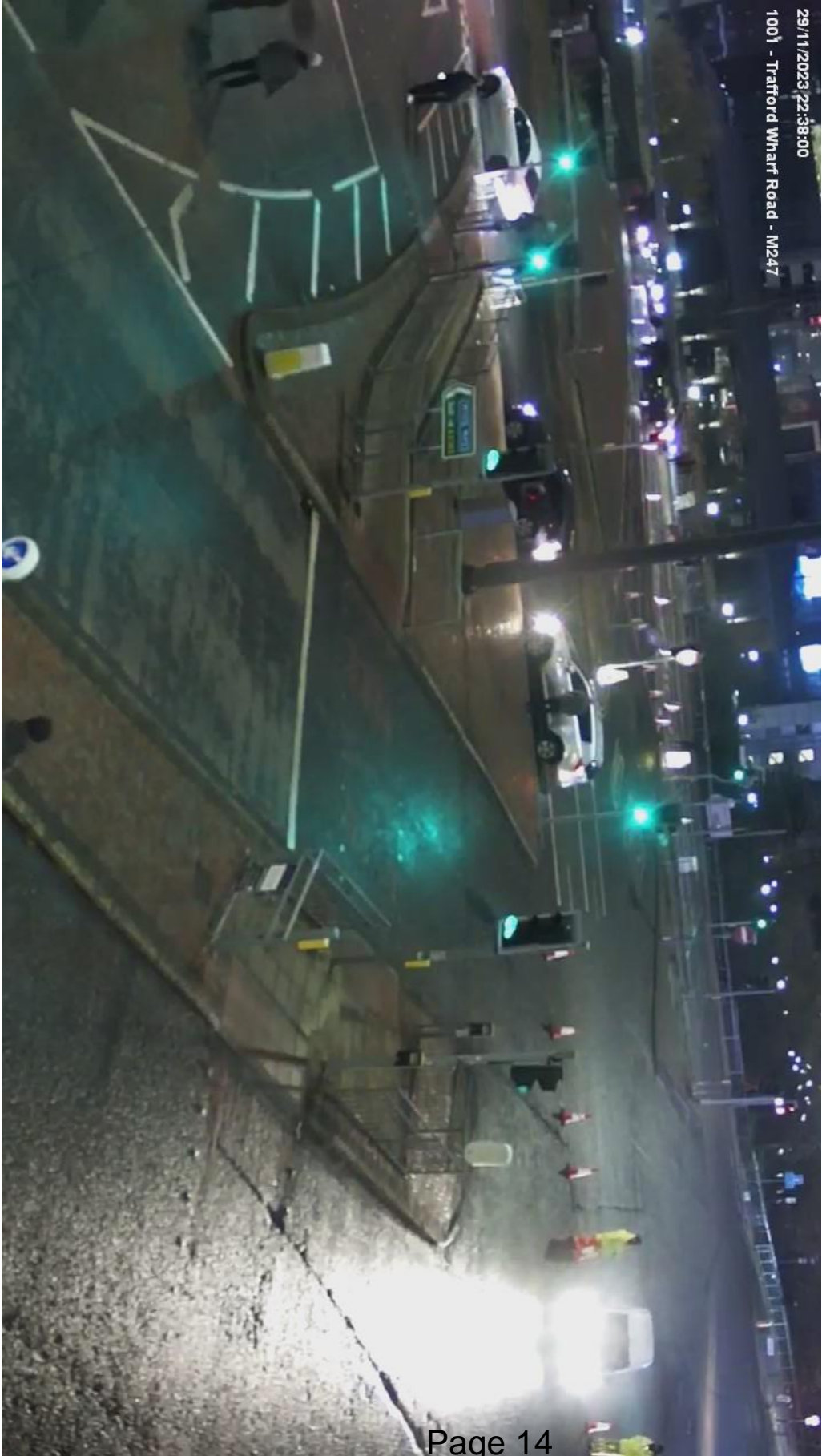
---

I verify that this is the exhibit marked NC3 in my statement.

Signed:

A large black rectangular redaction box covering the signature of the respondent.

Dated 30/11/2023



29/1/2023 22:38:00  
1001 - Trafford Wharf Road - M247



**IN THE MATTER OF S.52 OF THE LICENSING ACT 2003**

**B E T W E E N**

**TRAFFORD BOROUGH COUNCIL**

**APPLICANT**

**VICTORIA WAREHOUSE**

**RESPONDENT**


---

**EXHIBIT NC4**

---

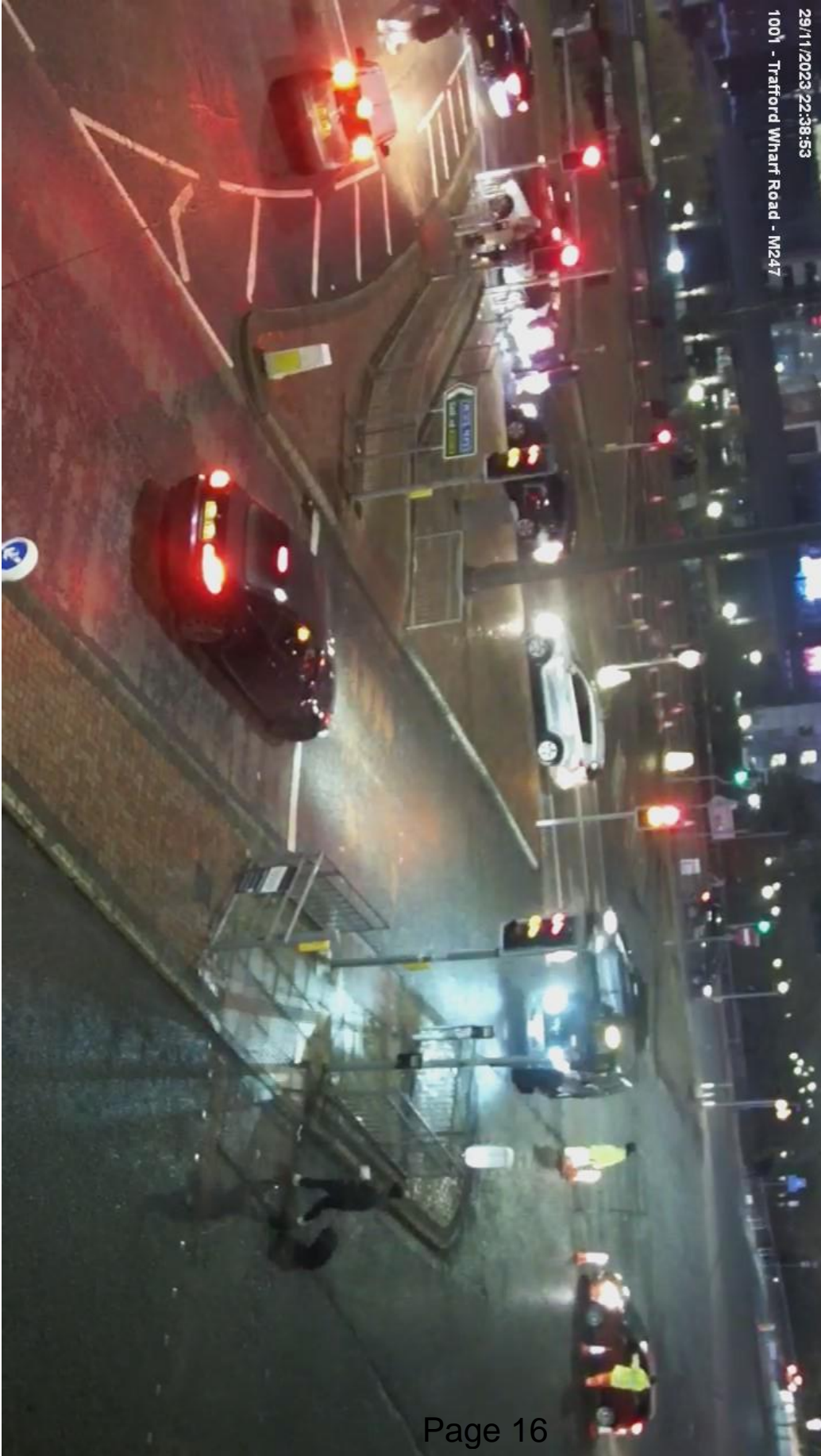
I verify that this is the exhibit marked NC4 in my statement.

Signed:

A large black rectangular redaction box covers the signature area. A small grey mark is visible at the bottom left corner of the redaction.

Dated 30/11/2023

29/11/2023 22:38:53  
1001 - Trafford Wharf Road - M247



**IN THE MATTER OF S.52 OF THE LICENSING ACT 2003**

**B E T W E E N**

**TRAFFORD BOROUGH COUNCIL**

**APPLICANT**

**VICTORIA WAREHOUSE**

**RESPONDENT**

---

**EXHIBIT NC5**

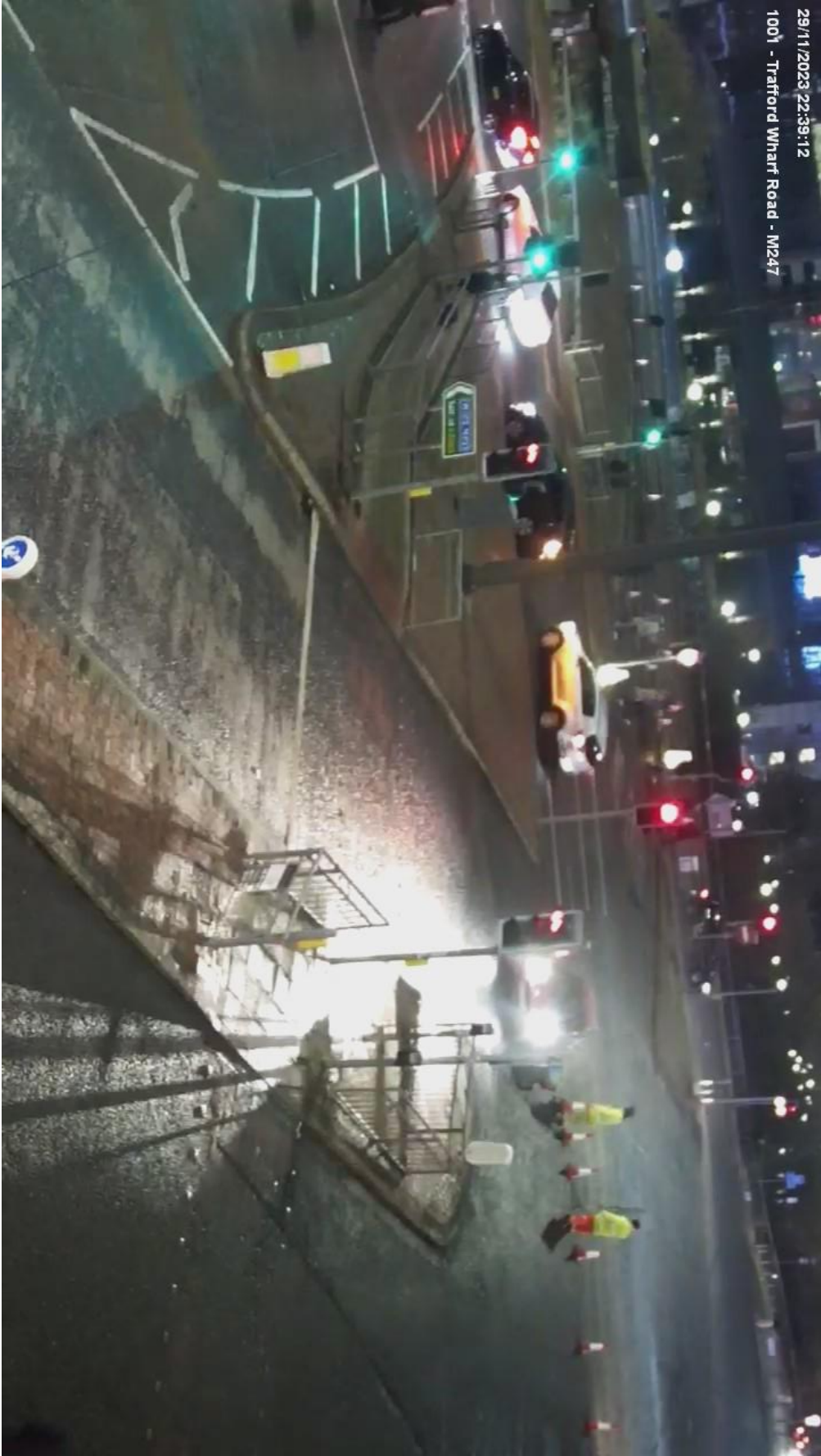
---

I verify that this is the exhibit marked NC5 in my statement.

Signed:

A large black rectangular redaction box covering the signature area.

Dated 30/11/2023



29/11/2023 22:39:12  
1001 - Trafford Wharf Road - M247

**IN THE MATTER OF S.52 OF THE LICENSING ACT 2003**

**B E T W E E N**

**TRAFFORD BOROUGH COUNCIL**

**APPLICANT**

**VICTORIA WAREHOUSE**

**RESPONDENT**

---

**EXHIBIT NC6**

---

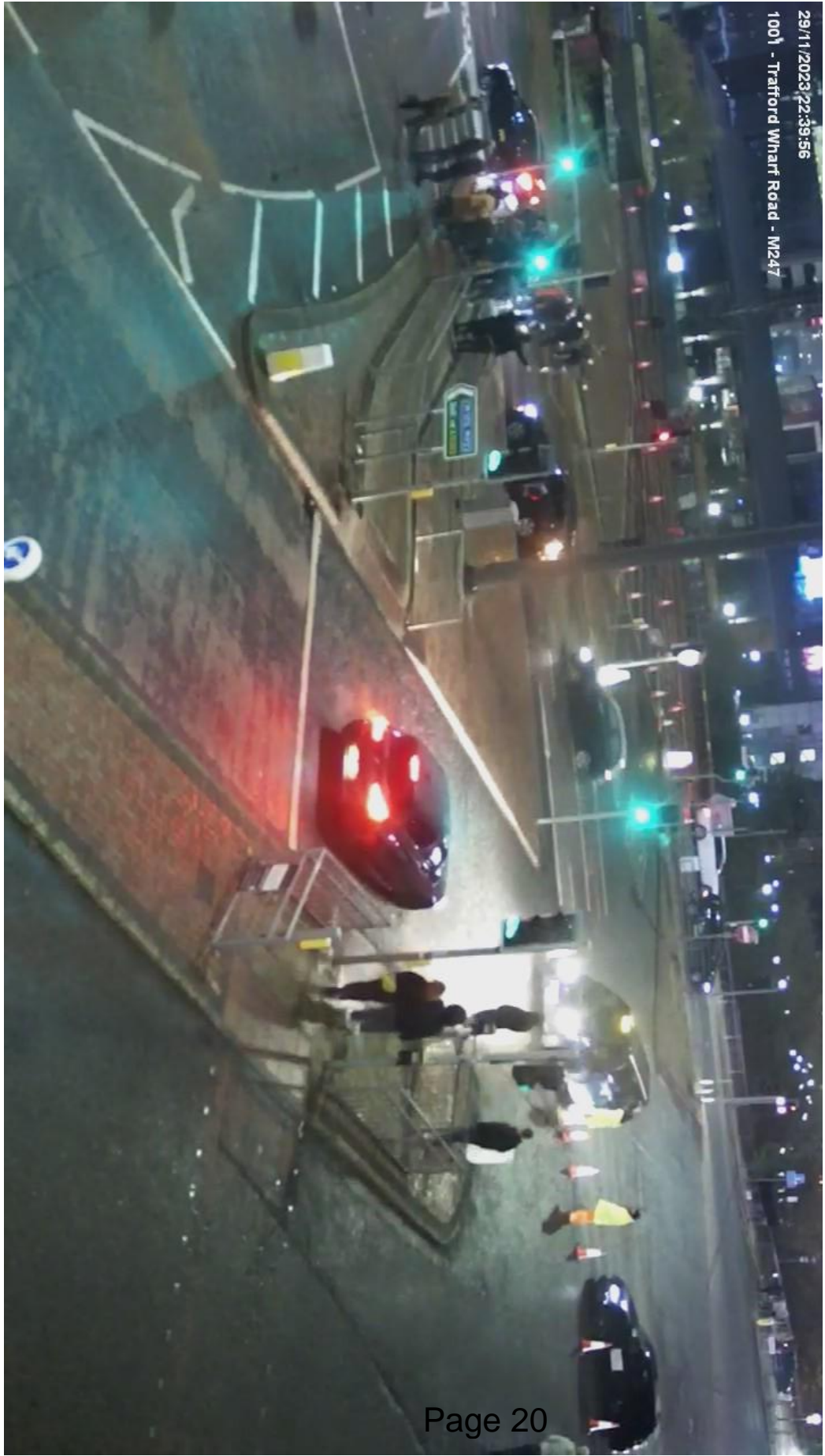
I verify that this is the exhibit marked NC6 in my statement.

Signed:

A large black rectangular redaction box covering the signature of the respondent.

Dated 30/11/2023

29/11/2023 22:39:56  
1001 - Trafford Wharf Road - M247



**IN THE MATTER OF S.52 OF THE LICENSING ACT 2003**

**B E T W E E N**

**TRAFFORD BOROUGH COUNCIL**

**APPLICANT**

**VICTORIA WAREHOUSE**

**RESPONDENT**

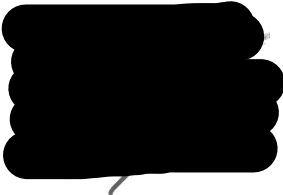
---

**EXHIBIT NC7**

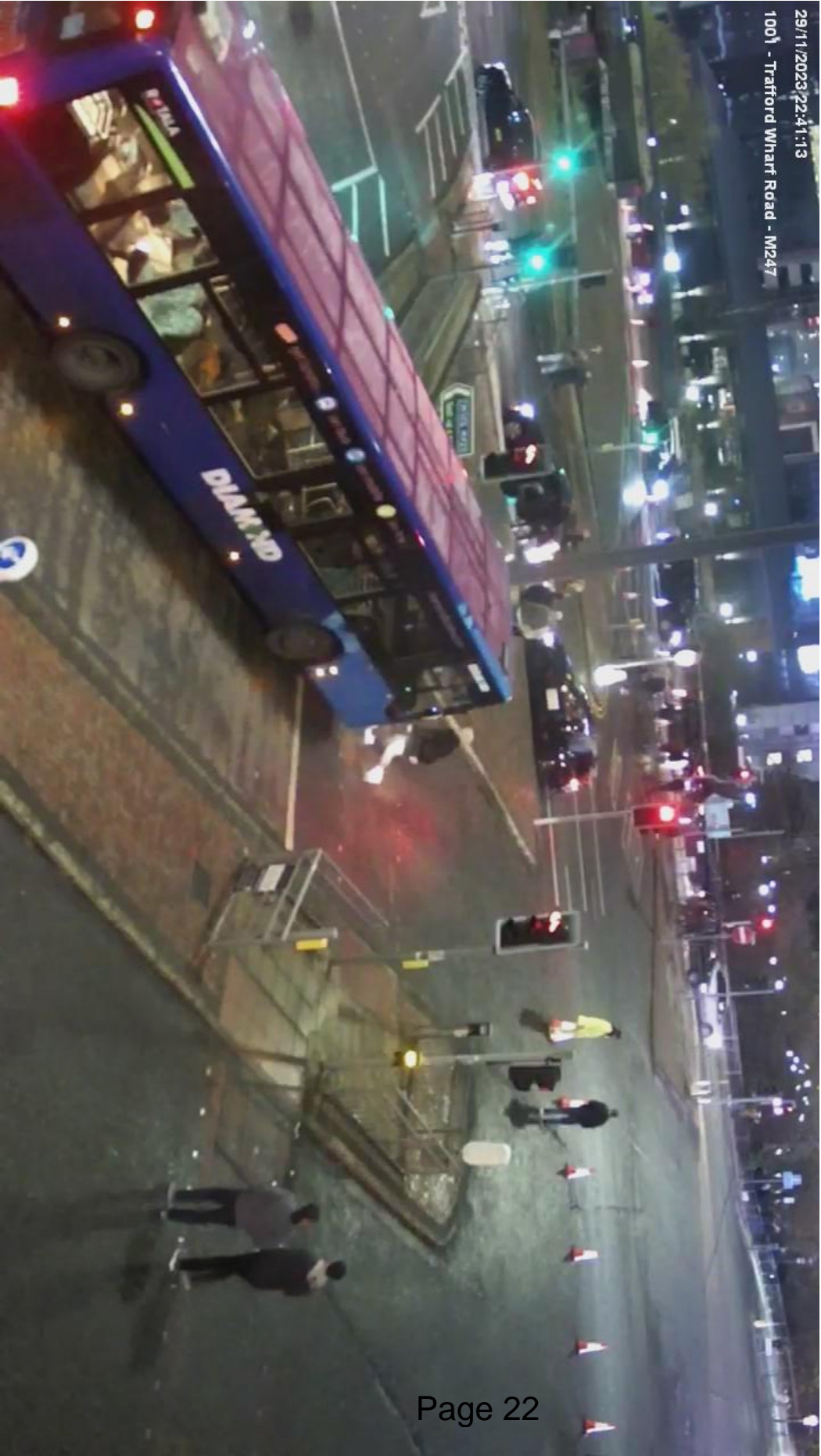
---

I verify that this is the exhibit marked NC7 in my statement.

Signed:

A large black rectangular redaction box covering the signature area.

Dated 30/11/2023



29/11/2023 22:41:13  
1001 - Trafford Wharf Road - M247



**IN THE MATTER OF S.52 OF THE LICENSING ACT 2003**

**B E T W E E N**

**TRAFFORD BOROUGH COUNCIL**

**APPLICANT**

**VICTORIA WAREHOUSE**

**RESPONDENT**

---

**EXHIBIT NC8**

---

I verify that this is the exhibit marked NC8 in my statement.

Signed:

A large black rectangular redaction box covering the signature area.

Dated 30/11/2023

This page is intentionally left blank

Before a Licensing Sub-Committee of Trafford Council

In the matter of:

A Review of the Premises Licence Number PLOOO631

and

The O<sub>2</sub> Victoria Warehouse

-----  
Third Statement of Nicola Duckworth  
-----

1. I am Nicola Duckworth and am the Team Leader for Environmental Health and I am authorised by Trafford Council to make this statement on behalf of Environmental Health in its capacity as a responsible authority.
2. Further to my previous statement in support an application for the review of the premises licence held by Academy Music Limited in respect of the O<sub>2</sub> Victoria Warehouse.
3. On the 8<sup>th</sup> November 2023, a complaint was received in relation to a safe guarding issue at O2 Victoria warehouse. The allegation was that a paramedic was working at the site who was under investigation by his employer, and the concern was that the paramedic should not for this reason be working in a patient facing role.
4. An investigation was commenced immediately, on the 22<sup>nd</sup> November 2023 I informed Steve Hoyland Operations manager of Academy Music Group of the complaint, and he responded with a email which gave assurances that the person who the complaint was made against would not be working at the venue until further notice. He also sent assurance that a full audit of the medical provider would be carried out. I asked for a copy of the audit once it had been carried out. I have not yet received this.
5. On the 29<sup>th</sup> November 2023, I carried out a visit to O2 Victoria warehouse accompanied by some officers from regulatory services team. The purpose of this visit was to look at the compliance with improvement notice served by Alison Acton in relation to event specific risk assessment, it was also to check how the venue was complying with the policies and procedures which have been sent in the event management plan.
6. I reviewed the event specific risk assessment and compared it with the stewards briefing note and noticed that there were differences in the information which was contained within them. The audience demographic was different and the risk from alcohol in the event risk

assessment stated it was low to medium, but the stewards briefing stated medium to high. When I questioned Mr Taylor-Toal in relation to the discrepancies he stated that the briefing was the more up to date documents. I am concerned that these two documents do not give the same information which could lead to confusion during the management of events.

7. I requested the sign in sheet for the medical team on site, I was informed that this was held by the medical team, so went to the portacabin to speak to the team. The supervisor for Northwest Medical Event Solutions informed me that there were 8 medical personnel onsite, and gave me their names and qualifications. One of the names given was the same person who I had been assured would not be working on site, until further notice.
8. I immediately found Mr Taylor-Toal and asked him if he was aware that this gentleman was on site. He said he was and that he knew about the situation, but the person was working under supervision. I asked him if he was aware of the assurances that we had been given in relation to this person. He said he wasn't, and I asked him to get Steve Hoyland on the phone. He did not reach Steve but got the area manager on the phone instead.
9. Mr Taylor-Toal, expressed his opinion that the local authority should have shared information with him in relation to our investigation. I stated that I had felt this unnecessary at this time, as I had been given written assurance that the person was no longer employed at the venue and that a thorough investigation was being carried out by the venue, I also requested that the audit be shared with the council, I have not yet received this audit.
10. Mr Taylor Toal informed me that the paramedic in question would be leaving site, I expressed my concern that this would leave them without a paramedic for the event. He went away to make a call and then returned to inform me that the medical company would be sending a new paramedic, to the site. The new paramedic which arrived was the owner of the medical company.
11. I am deeply concerned that despite assurances given, the venue continued to use this person whilst they investigated. Despite being informed of the risks involved.
12. I left the premises and returned in time for egress of the event. I remained outside the premises with Graeme Dixon, and Max Martin. At the time of arriving there were several cars parked up directly outside the exit to the warehouse and the hotel which is adjacent to the warehouse. There was also several Hackney carriages parked up. I questioned the Deputy Manager Manos, as to why these vehicles were allowed to park up here, as

according to the transport management plan which has been provided by the Academy Music Group, there should be a road closure in place , prior to the event closing and I was confused why the taxi's had been parked there, if they were going to be able to move. Manos explained that it was difficult to stop them. This concerned me, as a simple conversation with the drivers by the stewards, would inform the drivers that a road closure would prevent them moving on.

13. At egress it became apparent very quickly that the road closure which was supposed to be in place in accordance with the transport management plan was not affective. Cars and Taxis were being allowed to travel through the closure whilst people were crossing the road and trying to leave the premises.
14. A bus was also allowed through the closure.
15. Staff who were working for academy music group were walking in the middle of the road without high vis clothing.
16. The stewards were sending people towards white city circle to get Ubers and taxi's. This is contrary to the traffic management plan which indicates they will go in the opposite direction towards Manchester United Football Ground.
17. An email was sent on the 30<sup>th</sup> of November to Russell Taylor- Toal and Steve Hoyland to identify the concerns which have at the premises following the visit.
18. The main issues identified was that there was little adherence to the documented procedures which had been supplied to Trafford Council to form the event management plan.
19. I have consulted with out Highways department to alert them of the fact that the road closures in place are not working and that there is no adherence to the agreed plan. They have no been informed that the Traffic management contract has been subcontracted out by the original provider and they are having difficulties in enforcing the plan. This had not been previously shared with Trafford Highways team, by either Academy Music group. Trafford Highways have requested an urgent review.
20. Following the email sent to the Russell Taylor Toal and Steve Hoyland on the 30<sup>th</sup> in relation to the issues raised on, we viewed CCTV footage of the egress from the venue for the 1<sup>st</sup> December, & 2<sup>nd</sup> December, similar issues were found. The road closures were in affective, and taxis and buses were allowed through.

21. The lack of management of traffic at egress puts the people attending the event at risk, from being hit from moving vehicles either accidentally or intentionally. This matter was subject to a health & safety improvement notice in 2020, and was appealed, the matter of this notice is still outstanding, and at present the venue would be seen as not complying.
22. Trafford PITPOT (persons in positions of trust) are currently still investigating the incident with the paramedic. I am concerned that the venue does not carrying out sufficient checks against the medical provider to ensure the safety of persons attending the event. I have requested audits and lists of staff members since the notification of the matter and have still not received them at the time of writing this statement.
23. Investigations into the Traffic management and other issues raised at the premises on the 29<sup>th</sup> November are still being investigated, and matters at the time of writing this statement have not been resolved.

Statement of Truth

24. I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Dated 6<sup>th</sup> December 2023

A large black rectangular redaction box covering the signature area.

.....  
Nicola Jane Duckworth

In the matter of:

A Review of the Premises Licence Number PLOOO631

and

The O<sub>2</sub> Victoria Warehouse

---

Statement of Graeme Dixon

---

1. I am Graeme Dixon
2. I am an Environmental Health Officer employed by Trafford Council. My duties include enforcement of legislation in relation to Food Hygiene, Public Health, Health and Safety at Work and Safety at Sports Grounds. As part of my role I am also consulted on premises license applications as Environmental Health are one of the responsible authorities.
3. On Wednesday 29<sup>th</sup> November 2023 at approximately 19:00 I attended Victoria Warehouse, Trafford Wharf Road, Trafford Park, M17 1AG to carry out an inspection during the Sleaford Mods concert. During the visit I accompanied Mrs. Nicola Duckworth, Team Leader Environmental Health (Safety at Sports Grounds Lead), Mrs. Alison Acton, Environmental Health Officer, Mr. Max Martin, Environmental Health Officer and Mrs. Georgia Herbert, Environmental Health Regulatory Support Officer.
4. Upon our arrival Mrs. Duckworth identified us to the stewards and two supervisors who were stood at the entrance to 'E3' car park and the purpose of the visit. One of the supervisors, who I know to be [REDACTED], informed us that he was unable to let management know we were there as he didn't have a radio, however, the second supervisor did have a radio and was able to inform management of our arrival. After a brief period of time a gentleman who I know as [REDACTED], arrived to speak to us and we followed him into the building and into the management office.
5. Upon our arrival in the office we were met by Russell Taylor-Toal, Venue Manager and Phil Noe, Project Manager and Head of Security at Compact Security Services. Mrs. Duckworth explained the reason for our visit and requested a copy of the event specific risk assessment. During discussions I requested a copy of the Steward Deployment Plan and I was advised by Russell Taylor-Toal that the deployment plan is the same as the one previously submitted to Trafford Council.
6. During the visit I collected the following documents:
  - a. A copy of the event briefing sheet for the Sleaford Mods concert on 29/11/23 provided by Compact Security Services, which I exhibit as GDI/VW/1. This provides an overview of the event such as event times, audience profile, search protocols and key personnel. This was collected at the start of the visit.
  - b. A copy of the security signing in sheet for the Sleaford Mods concert on 29/11/2023 for Compact Security Services staff, which I exhibit as GDI/VW/2. This document

- provides a list of the SIA staff and stewards who were working the event and the times they were scheduled to work. This was collected at the start of the visit.
- c. A copy of the evacuation brief for the site, which I exhibit as GDI/VW/3. This briefing document contains information on alert codes and evacuation procedures.
  - d. A copy of the O<sub>2</sub> Victoria Warehouse Emergency Operations Plan. This plan is the same as the one which has previously been submitted to Trafford Council.
7. Having collected we left the office and found a space to review the event specific which Mrs. Duckworth had collected and compared it against the stewards briefing. Having compared the two documents differences were found as the steward briefing categorises alcohol use as medium/high and describes the search protocol as random bag and random pat down or hand-held metal detector where as the risk assessment categorises alcohol use as low/medium and has the search protocol as a full search policy. The stewards briefing also has the age group as 14+ where as during discussions with Russel Taylor-Toal we were informed that it event had an older crowd profile. Having reviewed the documentation we then split up to look at differing aspect of the event where I was tasked with reviewing the stewarding and security operation with Mr. Martin. We were accompanied during this time by Mr. Phil Now, Project Manager and Head of Security for Compact Security Services.
  8. We began this review by heading outside to the queueing area where Mr. Noe provided us with an overview of how the queue system was set up and observing searching members of the public prior to their tickets being scanned to permit entrance into the premises. After viewing this process for a brief period of time we went over to the gates to E3 carpark to question staff on their training and on information relevant to the event. During the discussions with Mr. Noe I was informed that staff wearing red hi-vis jackets were stewards or SIA staff and staff wearing blue were the supervisors.
  9. When we arrived at the gate I began speaking with [REDACTED] who was working the event as a steward but he has completed the SIA course and was awaiting his badge. I questioned [REDACTED] on the training completed to work as a steward and I was informed that he had completed Level 1 or Level 2 crowd control. [REDACTED] was able to confirm that he had attended the stewards briefing and discussed the site search that is completed prior to customers arriving. Whilst discussing the queuing lanes [REDACTED] began to inform me of an overflow queuing area outside of E3 carpark and at this point a gentleman who I believed worked at Victoria Warehouse called him over and began shaking his head. I believe that the gentleman worked for Victoria Warehouse as he was dressed in black clothing and was wearing a body camera, similar to [REDACTED] and Russell.
  10. After speaking with [REDACTED] I then questioned [REDACTED] who was working as a supervisor and showed me his SIA identification, although I had to ask to see it as it was not on display. During discussions with [REDACTED] he was able to demonstrate that he had now had a working radio as well as providing an over view of the role he was performing at the event. Whilst I was speaking with [REDACTED] and [REDACTED] Mr. Martin was speaking with other staff at the gate and did not report any concerns.
  11. After questioning staff on the E3 car park gate I spoke with Mrs. Duckworth who was observing crowd searching to update her on the responses to questioning we had received so far. I then moved inside the premises with Mr. Martin and Phil Noe.
  12. Upon entering the premises we went to speak to stewards near to the female toilets where I spoke with [REDACTED] who was working as a steward. During discussions with Megan I was informed that she had completed 'Police Training' for counter terrorism,



she had experience as working as a steward for a previous employer and provided me with an overview of her duties at the event. After speaking with [REDACTED] we then headed into the yard area where customers are permitted to smoke.

13. Whilst in the yard area I spoke with [REDACTED] who was positioned on the exit gate and is SIA trained. During discussions with [REDACTED] I discussed the emergency codes and what would happen if the code for an evacuation was called. [REDACTED] informed me that his role would be to open the gates which lead onto Trafford Wharf Road and remove the barriers on the other side with assistance from nearby colleagues. When I asked about how he would be informed that an evacuation was taking place I was told that he would find out when the doors to the venue opened. This raised concerns around the safe evacuation of persons in the venue and so I discussed this with Phil Noe who informed me of the process that is in place where the supervisor for the area would inform staff that an evacuation was taking place. We also discussed reviewing the briefing on deployment to ensure that this is addressed. We then moved back inside the building.
14. Upon entering the building we headed over towards the male toilets where I spoke with [REDACTED] who was working as a steward in this area. During discussions with [REDACTED] he was able to inform me of the training he had undertaken, confirmed that he had attended the stewards briefing and provided me with an overview of his duties. We then proceeded up to the mezzanine floor.
15. On the Mezzanine floor I spoke with [REDACTED] who was working as a supervisor and is SIA trained. Whilst speaking with [REDACTED] he was able to confirm that he had attended the stewards briefing and how he would inform colleagues of any incidents. Shortly after this we met up with Mrs. Duckworth and Mrs. Herbert to review the visit so far. We then proceeded to stand on the balcony to observe the crowd during the first few songs of the Sleaford Mods. We then left the balcony and I visited the bars with Mr. Martin and [REDACTED] to carry out hot water checks. We then met up again with Mrs. Duckworth, Mrs. Herbert and Mrs. Acton and left the site.
16. At approximately 10:15pm returned to Trafford Wharf Road with Mrs. Duckworth and Mr. Martin to observe egress from the concert. At this point the road outside Victoria was being implemented with a sign and a line cones across half Trafford Wharf Road by the junction of Waterside. This was followed with a line of cones across Trafford Road outside E3 car park. At the other end of the road there was a line of cones across half of Trafford Wharf Road outside Victoria Warehouse. Upon our arrival it was found that several Hackney taxi's were present within the road closure. There was also a substantial number of cars parked up at the side of the road, several of which were customers attending the concert. We were able to identify this due to observing people exiting the venue and getting in the cars. I took a photograph of taxi's parked up within the road closure which I exhibit as GDI/VW/4. At this point Mrs. Duckworth was speaking to Russel Taylor-Toal and [REDACTED] in relation to her concerns. I therefore approached and joined the conversation. During the discussions Russell made reference to the road closures in place at Manchester United and questioned why Trafford Wharf Road was not closed during match day egress.
17. After concluding the discussions I made my way to the junction of Trafford Wharf Road and Trafford Road to view the road closure that had been implemented. The road closure involved a line of cones, a road closed sign and a no left turn sign in the filter to prevent the use of the filter lane to turn left onto Trafford Wharf Road and a line of cones to prevent right turns onto Trafford Wharf as approaching from the direction of Salford. I refer you to the photograph I took which I exhibit as GDI/VW/5. There was also a line of cones

across the junction to prevent access from other directions. Due to the road closure private hire taxi's were stopping at the traffic light on Trafford Road. At approximately 10:30pm I observed a Hackney taxi approach the road closure and staff working on the closure moved the cones to allow them access. I then located Mrs. Duckworth and Mr. Martin, who were watching crowd egress and updated them on my observations. I then also began to watch egress.


18. Whilst egress was occurring members of the public were observed returning to their cars and driving within the road closure to leave the event. At 10:34pm a green car was seen reversing out of the area where they were parked opposite E3 car park whilst members of the public were in the road. I took a photograph of this which I exhibit as GDI/VW/6. At 10:38pm a Diamond Bus, route number X50, approached the road closure and at 10:39pm it was allowed through the road closure. I took two photographs of this which I exhibit as GDI/VW/7. At this point [REDACTED] was nearby and Mrs. Duckworth if the bus was being allowed through and who had made that decision. Manosh said that the bus was being allowed through and that he had given permission before going on to ask Mrs. Duckworth if she thought it was dangerous to which Mrs. Duckworth advised she thought it was. [REDACTED] responded by saying that "if you think this is dangerous you should come down when United is on". We left site shortly after.
19. On Thursday 30<sup>th</sup> November 2023 I contacted Mr. Neill Courtney, Community Safety and CCTV Leader to ask if there were any CCTV camera's in the area whether they captured on footage during the egress period. I refer you to the statement of Mr. Neill. Courtney.
20. On Friday 1<sup>st</sup> December 2023 I began verifying the SIA licence numbers of the sign in sheet on the online register of licence holders. When I checked the licence for [REDACTED] the result that came back was that the licence number was not valid. I was aware that colleagues from the council were carrying out a further visit that night and therefore contacted Melissa Shine, Senior Fair Trading Officer, and requested she check [REDACTED] SIA badge to verify that he holds a valid SIA licence.
21. On the 4<sup>th</sup> December 2023 I received an email from Melissa Shine with a photograph of [REDACTED] SIA badge and noticed that the number recorded on the signing in sheet was different. I checked the number on the photograph on the online register of licence holders and was able to verify that the SIA licence was valid.
22. On the 5<sup>th</sup> December 2023 I completed verifying the SIA licence number on the online register of licence holders. At the conclusion of this I had identified the following:
  - a. The licence number on the signing in sheet for [REDACTED] shows on the online register of licence holders as belonging to [REDACTED]
  - b. The licence number on the signing in sheet for [REDACTED] could not be verified on the online register of licence holders
  - c. The licence number on the signing in sheet for [REDACTED] shows on the online register of licence holders as belonging to [REDACTED]
  - d. The licence number on the signing in sheet for [REDACTED] could not be verified on the online register of licence holders
23. On the same day I also received CCTV footage from Mr. Courtney showing the junction of Trafford Wharf Road and Trafford Road on Wednesday 29<sup>th</sup> November 2023 between 22:20 and 22:50. From reviewing the footage there were several instances where

Hackney Taxi's were allowed to enter the road closure by staff from the traffic management company by moving the cones out of the way. There were also several instances of vehicles exiting the road closure having come from the direction of Victoria Warehouse. At 22:35 two pedestrians can be seen walking in the road at the junction heading in the direction of 'White City Roundabout' and a white car is observed driving in close proximity to the pedestrians.

Statement of Truth

24. I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Dated 7/12/23



.....  
Graeme Dixon

Before a Licensing Sub-Committee of Trafford Council

In the matter of:

A Review of the Premises Licence Number PLOOO631

and

The O<sub>2</sub> Victoria Warehouse

---

**EXHIBIT GDI/VW/1**

---

I verify that this is the exhibit marked GD/VW/1 in my statement.

Signed:

A black rectangular redaction box covering the signature of the person verifying the exhibit.

Dated 7/12/23







18:00:00

23:30:00

29/11/2023

29/11/2023

29/11/2023

29/11/2023

29/11/2023

29/11/2023

29/11/2023

29/11/2023

29/11/2023

29/11/2023

29/11/2023

29/11/2023

29/11/2023

29/11/2023

29/11/2023

29/11/2023



Before a Licensing Sub-Committee of Trafford Council

In the matter of:

A Review of the Premises Licence Number PLOOO631

and

The O<sub>2</sub> Victoria Warehouse

---

**EXHIBIT GDI/VW/2**

---

I verify that this is the exhibit marked GD/VW/2 in my statement.

Signed:

A black rectangular redaction box covering the signature of the person verifying the exhibit.

Dated 7/12/23

## Sleaford Mods

29/11/23

**Demographic:** 30 % Female 70 % Male

**Age group:** 14+

**Expected:** 1800

**Ingress:** Ingress through E3

**Egress:** Egress through the side gate and E3 car park. Road closure activation.

**Doors:** 19:00

**Curfew:** 23:00

**Support:** BIG SPECIAL 20:00 - 20:30

**Main Act:** SLEAFORD MODS 21:00

**Drugs Use:** Low

**Alcohol Use:** Medium/High

**Current National Threat Level:** **SUBSTANTIAL**

- **BEWARE OF PEOPLE VULNERABLE PERSONS IN THE QUEUE AND LEAVING THE VENUE**
- **BEWARE OF PRELOADING ALCOHOL IN THE QUEUE**
- **CHALLENGE 25 ALCOHOL ID IN FORCE**
- Lost property to passed to the Supervisor and dropped in at Cloak Room
- Lost property  
[Enquiries@academy-music-group.co.uk](mailto:Enquiries@academy-music-group.co.uk)
- Taxi Number;  
Street Cars 0161 228 7878  
Club Cars - 0161 747 9090

### Customer Service

#### All staff to be aware of nearest:

Radio Holder, Toilets, Disabled Platform, Disabled Toilets, Medical Point, Exits, Box Office

#### Show Specifics

- Mezz/Balcony for accessibility customers only.
- Possible mobile phone thefts, if you notice anything suspicious or anyone reports a missing phone contact control immediately.
- Welfare opposite female toilets.
- Customers allowed access to queue lanes on E3 with food and drink (non alcoholic)

### KEY PERSONS

<b>VICTOR MIKE</b>	VENUE MANAGER – RUSSELL TAYLOR-TOAL
<b>DELTA MIKE</b>	DUTY MANAGER – MANOS CHATZAKIS
<b>PAPA MIKE</b>	PRODUCTION MANAGER – RUSSELL PATE
<b>ALPHA ONE</b>	HEAD OF SECURITY – SYDNEY HOAZ
<b>ALPHA TWO</b>	SITE COORDINATOR - JIM WALKER
<b>MEDICS</b>	MEDICAL TEAM – NORTH WEST
<b>CONTROL</b>	COMPACT CONTROL – SHARON ALLEYNE

### PROHIBITED ITEMS

- Aerosols
- Alcohol
- Animals except assistance dogs
- Audio recording devices, pro cameras and tablets
- Bags larger than A4 and luggage
- Bicycles, scooters and skateboards
- Chairs or stools
- Food and drink\*
- Flares, fireworks and smoke devices
- Glass objects or vessels
- Drones
- Helmets
- Illegal drugs and substances\*
- Lasers
- Large umbrellas
- Liquids and gels (100ml+)
- Metal cans and objects
- Nitrous oxide
- Perfumes (100ml+)
- Promotional material, stickers and flags
- Pushchairs
- Selfie sticks
- Spray cans, markers and graffiti pens
- Weapons, tools and blades

**Seek confirmation if unsure from supervisor or control**

### SEARCH PROTOCOL

Terms and conditions-based search for prohibited items

- Random Bag search
- Random pat down or hand-held metal detector scan

### ACCESSIBILITY

**With Q jump – Sunflower lanyard for hidden disabilities** – indicates people who may have additional needs or a disability that is not necessarily visible. Access is still booked via the box office but it is important that staff know what this means.

Incidents involving disabled customers or access to facilities **MUST** be referred to a supervisor immediately and incident reports filled in for those involved.

## SEXUAL ASSAULT

The term sexual assault refers to sexual contact or behaviour that occurs without explicit consent of the victim. Some forms of sexual assault include:

Attempted rape, fondling or unwanted sexual touching Forcing a victim to perform sexual acts, such as oral sex or penetrating the perpetrator's body

Sexual assault can take many different forms, but one thing remains the same - **it is never the victim's fault**. Should any such complaint be made to a member of staff the company guidance on how to deal the situation, in order to safeguard the individual and general health, safety and welfare of patrons, is as follows:

The complainant should be taken to a quiet area to find out the nature of the grievance. Staff should remember to listen to the complainant, let them stay in control and be aware that they may have a heightened sensitivity to judgement or blame.

- **A full name, age, contact details and a description of an alleged assaulter(s) should be taken.**
- **The alleged assaulter(s) should be identified and observed whilst details of the complaint are reported.**
- **Once it is clear there IS a complaint to be dealt with, the alleged assaulter(s) should be taken to one side and the identity of such person(s) must be established and at the complainant's request, the police called.**
- **Any witnesses should be identified and their contact details recorded.**
- **If the victim is under 18, parents or a responsible guardian or adult over 18 must be contacted.**

## CRIME SCENE PRESERVATION

- **Date & time of arrival**
- **Detain offender**
- **Avoid cross contamination of evidence**
- **Separate victims and offenders**
- **Secure scene & record who enters**
- **Prevent loss of evidence/interference**
- **Take witness detail (how can they be contacted on site)**
- **Handle evidence as little as possible (this includes recovered stolen property)**  
**Place evidence in a box or a bag. Leave evidence in situ if you can**

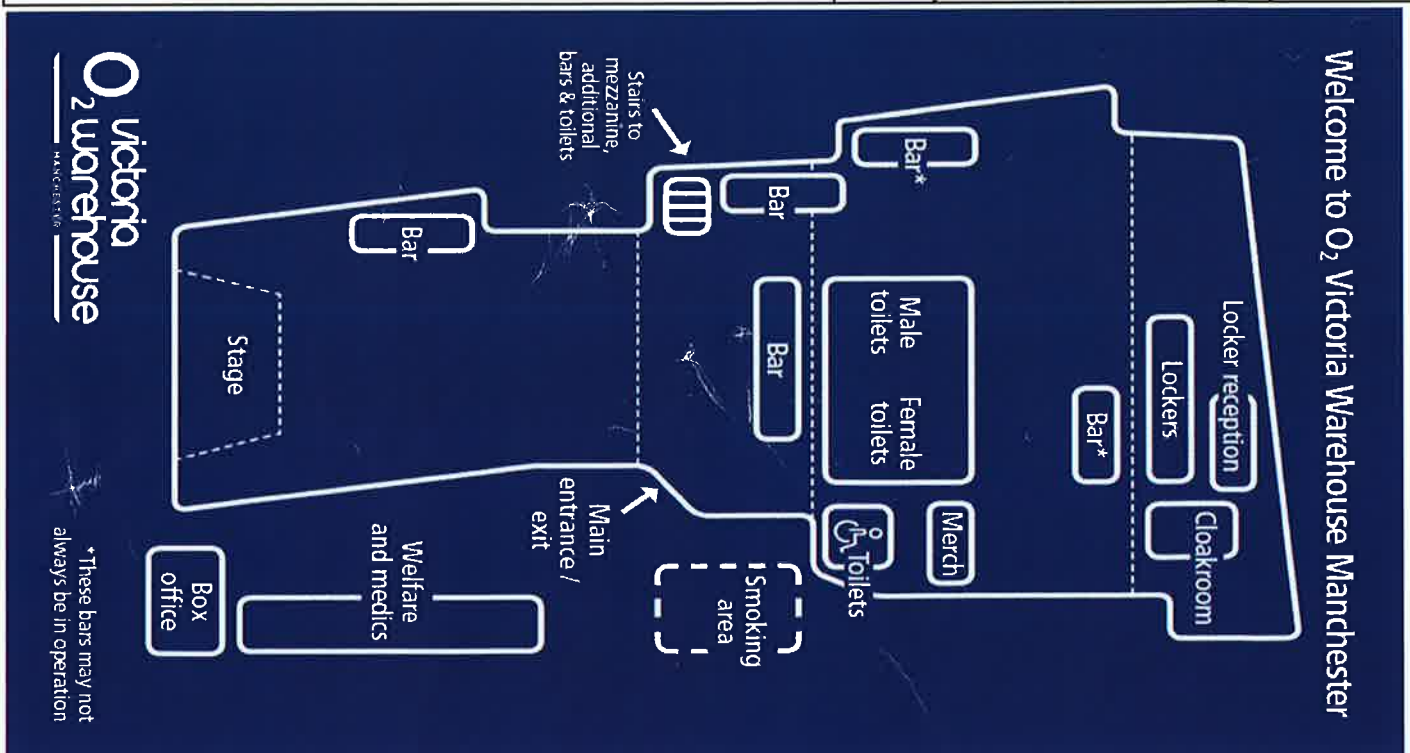
## VULNERABLE PERSON

Please ensure that any person that you feel to be vulnerable are stopped on attempting to leave the venue. Provide Taxi Numbers. Ask questions – Do they know the person they are with? Do they have friends inside? Can you reunite them? Do they have a phone? Is it charged? Advise them there is a mobile phone charging facility in the cloakroom.

**Ask For Angela** scheme is a safety initiative supported by this venue through which people who feel unsafe or threatened can discreetly request for help by approaching a staff member (usually security personnel) and asking them 'for Angela.' This code phrase alerts staff that assistance or support is needed- Staff should discreetly escort the person to the welfare area where assistance/ support will be given

### Do not eject lone vulnerable persons.

At showdown, if there are still incapable persons on Site they **must** be handed to emergency services.



Before a Licensing Sub-Committee of Trafford Council

In the matter of:

A Review of the Premises Licence Number PLOOO631

and

The O<sub>2</sub> Victoria Warehouse

---

**EXHIBIT GDI/VW/3**

---

I verify that this is the exhibit marked GD/VW/3 in my statement.

Signed:

A black rectangular redaction box covering the signature.

Dated 7/12/23

<b>Remember: ACT</b>	<b>RUN, HIDE, TELL</b> - IN THE RARE EVENT OF a firearms or weapons attack
Action Counters Terrorism	<ul style="list-style-type: none"> <li>RUN to a place of safety. This is a far better option than to surrender or negotiate. If there's nowhere to go, then...</li> <li>HIDE it's better to hide than to confront. Remember to turn your phone to silent and turn off vibrate. Barricade yourself in if you can. Then finally and only when it is safe to do so...</li> <li>TELL the police by calling 999.</li> </ul>

Hazardous Substances – Remove, Remove, Remove	
If you think someone has been exposed to a HAZARDOUS SUBSTANCE - Use caution and keep a safe distance to avoid exposure to yourself.	
<b>REMOVE THEMSELVES...</b>	
<ul style="list-style-type: none"> <li>...from the immediate area to avoid further exposure to the substance. Fresh air is important. If the skin is itchy or painful, find a water source.</li> </ul>	
<b>REMOVE OUTER CLOTHING...</b>	
<ul style="list-style-type: none"> <li>...if affected by the substance. Try to avoid pulling clothing over the head if possible. Do not smoke, eat or drink. Do not pull off clothing stuck to skin.</li> </ul>	
<b>REMOVE THE SUBSTANCE...</b>	
<ul style="list-style-type: none"> <li>...from skin using a dry absorbent material to either soak it up or brush it off. RINSE continually with water if the skin is itchy or painful.</li> </ul>	

Bomb Threat	
Immediate steps if you receive a bomb threat communication. <b>Remember:</b> Inform your Supervisor, Event Control or Line Manager <b>IMMEDIATELY</b>	
<p><b>If you receive a telephone threat you should:</b></p> <ul style="list-style-type: none"> <li>stay calm and listen carefully</li> <li>have immediate access to a checklist on key information that should be recorded (<b>Scan QR Code in this section</b>)</li> <li>if practical, keep the caller talking and alert a colleague to dial 999</li> <li>if displayed on your phone, note the number of the caller, otherwise, dial 1471 to obtain the number once the call has ended</li> <li>if the threat is a recorded message write down as much detail as possible</li> <li>if the threat is received via text message do not reply to, forward or delete the message; note the number of the sender and follow police advice</li> <li>know who to contact in your organisation upon receipt of the threat. e.g., building security/senior manager, as they will need to make an assessment of the threat</li> </ul>	<p><b>If the threat is delivered face-to-face:</b></p> <ul style="list-style-type: none"> <li>Try to remember as many distinguishing characteristics of the threat-maker as possible.</li> </ul> <p><b>If discovered in a written note, letter or as graffiti:</b></p> <ul style="list-style-type: none"> <li>Treat as police evidence and stop other people touching the item</li> </ul> <p><b>If the threat is received via email or social media application:</b></p> <ul style="list-style-type: none"> <li>Do not reply to, forward or delete the message</li> <li>If sent via email, note the address</li> <li>If sent via social media, what application has been used and what is the username/ID?</li> <li>Dial 999 and follow police guidance</li> <li>Preserve all web log files for your organisation to help the police investigation (as a guide, 7 days prior to the threat message and 48 hours after)</li> </ul>

HOSTILE RECONNAISSANCE	
"Purposeful observation with the intention of collecting information to inform the planning of a hostile act against a specific target."	
<b>SIGNS OF SUSPICIOUS ACTIVITY - What are the signs of suspicious activity?</b>	
<p><b>External appearance:</b></p> <ul style="list-style-type: none"> <li>Clothes unsuitable for the time of year (e.g., a heavy coat in summer).</li> <li>Anything protruding in an unusual way under the person's clothing.</li> <li>Large Clothing. Sizes too big for the personal stature.</li> </ul> <p><b>Suspicious behaviour:</b></p> <ul style="list-style-type: none"> <li>Nervousness, tension, profuse perspiration.</li> <li>Walking slowly while glancing right and left, or running in a suspicious manner.</li> <li>Repeated attempts to avoid security staff.</li> <li>Repeated nervousness concerning something underneath clothing.</li> <li>Nervous, hesitant mumbling.</li> <li>Avoiding CCTV</li> <li>Constant Phone usage or Taking photos of the venue/entrances, CCTV areas/Cameras</li> </ul> <p><b>Suspect equipment, tools, and accessories:</b></p> <ul style="list-style-type: none"> <li>A suitcase, shoulder, handbag, or backpack.</li> <li>Electrical wires, switches, or electronic devices sticking out of the bag or pocket.</li> </ul> <p><b>How to identify a suspicious vehicle?</b></p> <ul style="list-style-type: none"> <li>Vehicle licence plate looks "improvised" or mismatched (different front and back plates).</li> <li>A vehicle parked suspiciously for a prolonged time in a central place or in a no-parking area.</li> <li>A vehicle is noticeably loaded down.</li> <li>The same vehicles spotted an unusual number of times.</li> </ul>	<p><b>What to do if you suspect something?</b></p> <ul style="list-style-type: none"> <li>Contact Event control, your supervisor, or Line Manager <b>immediately</b> and give the as many details as possible about the suspect or the vehicle.</li> <li>While speaking to control, try to keep an eye on the suspect or vehicle from a safe distance.</li> <li>Wait for response or police to arrive.</li> </ul> <p><b>What to do during a terrorist attack?</b></p> <ul style="list-style-type: none"> <li>Leave the area immediately, moving to an open space or a protected area.</li> <li>Avoid, as best you can, tall buildings, glass windows, and vehicles.</li> <li>If there are police in the area, follow their instructions.</li> </ul> <p><b>How to behave if you find yourself around a suicide bombing or shooting?</b></p> <ul style="list-style-type: none"> <li>Keep calm and don't panic</li> <li>Keep alert, especially in crowded places.</li> <li>If the person is trying to gain entry close main gates to site and contact control for immediate police assistance.</li> <li>If you come across a suspicious person, suspicious object, or suspicious vehicle – alert event control or a police officer.</li> </ul> <p><b>What to do as soon as the terror incident is over?</b></p> <ul style="list-style-type: none"> <li>If the police have not arrived yet – call 999 immediately. Follow the Instructions of the police and rescue teams.</li> <li>Do not form or join a crowd! Leave the area immediately: there may be additional explosive charges around.</li> <li><b>Make a route clear for rescue vehicles.</b></li> <li>Observe your surroundings, and report immediately any suspects or additional explosive charges to the police.</li> <li>The anti – terror hotline can be used for suspicious potential terror issues.</li> </ul>
<p><b>** If you suspect any form of suspicious behaviour, including Hostile Reconnaissance you must report this to your Supervisor, Event Control or Line Manager IMMEDIATELY and then fill in an incident report as outlined in the Incident Reporting section of this briefing when safe to do so **</b></p>	

## Evacuation Brief

ALERT STATES	RV POINTS
<p><b>YELLOW – INVESTIGATION UNDERWAY – STANDBY TO EVACUATE</b></p> <p><b>RED – EVACUATION</b></p> <p><b>STANDOWN – NORMAL MODE BEING RESTORED</b></p>	<p>Once the decision has been made to evacuate the building AMG employees <b>MUST</b> do the following:</p> <div style="background-color: black; width: 100%; height: 100%; min-height: 150px;"></div>

## CODE WORDS

- MR SANDS = FIRE
- MR SANDS FRIEND = SUSPICIOUS PACKAGE OR OTHER THREAT

## EVACUATION OF ACCESSIBLE CUSTOMERS

In the event of an evacuation the following actions should take place by the designated Access Customer Evacuation Team (Security). Security are responsible for the evacuation of all disabled / access patrons requiring assistance.

- Access customers requiring assistance should remain within their seats / viewing platform until the security evacuation team instructs otherwise - there are no designated 'refuge points' within the venue.
- Customers with no access requirements will evacuate first to prevent a delay in the overall evacuation procedure, except of course where it is considered a person(s) would be in immediate danger.
- Once customers without access requirements have evacuated the building an Internal Response Team will assist all accessible customers to the nearest fire exit.
- The individual needs of each accessible customer (i.e. Wheelchair, ambulant, vision impaired, hearing impaired etc) will have been detailed in advance of the show and appropriate assistant methods are planned and implemented based on the individual circumstances of each access customer.
- Once all accessible customers have been evacuated Head of Security will report to Duty manager.

## CODE YELLOW

evacuate people safely using appropriate escape routes

## CODE RED

Call Sign	Position	Code Yellow Role	Code Red - Evacuation Role
Control		Follow code yellow evac procedure	Follow code red evac procedure - Call 999
Alpha 1		Move to Security Control Room	Co-Ordinate evacuation from control with DM
Sierra 1	Queue Management	Hold Ingress	Clear egress routes of barriers/ obstruction Assist egress of customers from the venue and direct away to safety Assign someone to open E3
Sierra 2	Search Lanes	Hold Ingress Prepare for egress	Assist egress of customers from the venue and direct away to safety, clear lamnes Evac public via all safe routes
Sierra 3	Pit		Assist egress of customers from Shed A Sweep shed A up to the Shed A bar and confirm to Alpha 1/ Control all customers clear
Alpha 3			Confirm all internals clear Assign staff member to clear female and accessible toilets
Sierra 5	Mezzanine		Clear the Mezzanine via the egress routes
Sierra 6	Stage Right		Follow directions from Sierra 3
Sierra 7	Stage Left		Follow directions from Sierra 3
Sierra 8	Accessibility		Follow procedure of page 1
Sierra 9	Gate 2 Staff Search	Stop entry to non essential staff	Assist in safe egress of BOH position by directing them to safety
Sierra 11	Mixer		Clear male toilets
Sierra 13	Side Gate	Prepare to open Side Exit	Open Side Exit and assist in egressing people out safely
Sierra 14	Shed A Fire Exit	Prepare to open fire exits	Open fire exits and assist in egressing people out safely
Sierra 15	Shed A Fire Exit	Prepare to open fire exits	Open fire exits and assist in egressing people out safely
Sierra 16	Cloak Room	Prepare to open fire exits	Open fire exits and assist in egressing people out safely
Sierra 17	E3	Prepare to open E3 gate	Open E3 gate and assist in egressing people out safely

COUNTER-TERRORISM AWARENESS	
CT National Threat Level – Substantial – Meaning: an attack is likely – <a href="https://www.mts.gov.uk/threat-levels">https://www.mts.gov.uk/threat-levels</a>	
Description of Attack Methods Included In Compact CT Risk Assessment	
NACSO Crowded Places Guidance – <a href="https://www.gov.uk/government/publications/crowded-places-guidance">https://www.gov.uk/government/publications/crowded-places-guidance</a>	
<p><b>Firearms and Weapons Attack</b></p> <p>Marauding Terrorist Attacks (MTAs) are fast-moving, violent attacks where assailants move through a location aiming to find and kill or injure as many people as possible. These could include attacks of low sophistication, such as those using bladed weapons or vehicles, through to more complex attacks involving firearms or explosives.</p>	<p><b>Vehicle as a Weapon</b></p> <p>The threats from vehicles range from vandalism to sophisticated or aggressive attacks by determined criminals or terrorists. As well as a convenient method to deliver an improvised explosive device an additional attack methodology is using a vehicle as a weapon (VAW).</p>
<p><b>Person-borne Improvised Explosive Devices (PBIEDs)</b></p> <p><b>Improvised Explosive Device (IED)</b></p> <p>An IED is a 'homemade' bomb. The main explosive charge in an IED may be made from home made explosive (HME), they may still be as powerful as commercial or military explosives. Although an IED is 'homemade', they can be highly sophisticated and very effective.</p> <p>They can be delivered using the following methods:</p> <ul style="list-style-type: none"> <li>Person Borne Improvised Explosive Device (PBIED) <ul style="list-style-type: none"> <li>There is no definitive physical profile for a suicide bomber, so remain vigilant and report anyone suspicious to the police.</li> </ul> </li> <li>Vehicle Borne IED (VBED) &amp; Under Vehicle IED (UVIED) <ul style="list-style-type: none"> <li>See 'VBED' for description.</li> </ul> </li> </ul>	<p>A vehicle by itself can also be used with hostile intent to breach a perimeter, ram and damage infrastructure, or as a weapon to injure and kill people.</p> <p><b>Chemical, Biological and Radiological (CBRR)</b></p> <ul style="list-style-type: none"> <li>Chemical - Poisoning or injury caused by chemical substances, including traditional military chemical warfare agents, harmful industrial or household chemicals.</li> <li>Biological - Illnesses caused by the deliberate release of dangerous bacteria or viruses or by biological toxins, such as ricin, found in castor oil beans.</li> <li>Radiological - Illness caused by exposure to harmful radioactive materials.</li> </ul> <p>Within the wider definition of CBRR, the term 'White powder' is also often used in a mail context to describe the potential presence of a noxious substance (or hoax material) in a letter or parcel that is designed to cause significant harm or disruption.</p> <p><b>Bomb Threats</b></p> <p>A bomb threat can be communicated in a number of different ways. The threat is likely to be made in person over the telephone; however, it may also be a recorded message, communicated in written form, delivered face-to-face or, increasingly, sent by email or social media (e.g., Twitter or Instagram, etc.). A threat may be communicated via a third-party, i.e., a person or organisation unrelated to the intended victim and identified only to pass the message.</p>
<p><b>Vehicle-Borne Improvised Explosive Device (VBED)</b></p> <p>A VBED is a vehicle that contains and delivers an explosive device to a target. The vehicle may be old or new, inexpensive or valuable, licensed or plain, blend into most situations and modified to prevent detection. VBEDs can range in size from bicycles to cars, trailers, vans and large goods vehicles.</p>	<p><b>Unmanned Aircraft Systems (Drones)</b></p> <p>Unmanned Aircraft Systems (UAS), also commonly referred to as drones or Remotely Piloted Aircraft Systems (RPAS), are aircraft that operate without a pilot being on-board.</p> <p>Example Misuses of Drones:</p> <ul style="list-style-type: none"> <li>Danger to civil aircraft. Local Smuggling, Protest Groups, Journalism, Espionage, Physical Attack, Hostile Reconnaissance</li> </ul>
<p><b>Fire as a Weapon</b> - Fire as a weapon (FAW) attacks are intended to cause harm. Fire and smoke alone can provide a lethal mix, when combined with other terrorist attack methods as part of a Marauding Terrorist Attack (MTA), this can create an extremely challenging and complex situation.</p> <p>FAW is likely to be employed in one or more of the following ways:</p> <ul style="list-style-type: none"> <li>Used as a distraction tactic which will draw the attention or response of security officers, which may allow vulnerabilities to be exploited, e.g. attackers may enter a building while security officers are focused on the fire.</li> <li>Augment other attack method(s) (bladed weapons, firearms etc) and so cause injury or damage to property, through the use of accelerants e.g. petrol bombs (aka Molotov cocktails) or other incendiary methods.</li> <li>Trigger a fire evacuation which might cause people to become vulnerable to an attack.</li> <li>Causing disruption or delay with the intent of preventing or restricting emergency responders confronting the attackers, carrying out life saving operations and extinguishing the fire.</li> <li>If you smell petrol on a person, see someone is acting suspiciously and also carrying items that could be associated with FAW – such as a wine/beer bottle with a rag, a petrol can, a daypack with a strong odour of petrol etc.</li> <li>If there is an attack follow any instructions, evacuation or Run, Hide Tell advice</li> </ul>	<p><b>Suspicious Items – HOT Procedure &amp; 4 C's</b></p> <p>Should the incident still cause you to be suspicious or alerted then adhere to the following steps (4 C's)</p> <p><b>CONFERM</b> whether or not the item exhibits recognisably suspicious characteristics.</p> <p><b>CLEAR</b> the immediate area</p> <ul style="list-style-type: none"> <li>Do not touch it</li> <li>Take charge and move people away to a safe distance. Even for a small item such as a briefcase move at least 100m away from the item starting from the centre and moving out</li> <li>Keep yourself and other people out of line of sight of the item. It is a broad rule, but generally if you cannot see the item then you are better protected from it</li> <li>Think about what you can hide behind. Pick something substantial and keep away from glass such as windows and skylights</li> <li>Cordon off the area</li> </ul> <p><b>COMMUNICATE</b> - call 999</p> <ul style="list-style-type: none"> <li>Inform your control room and/or supervisor</li> <li>Do not use radios within 15 metres</li> </ul> <p><b>CONTROL</b> access to the cordoned area</p> <ul style="list-style-type: none"> <li>Members of the public should not be able to approach the area until it is deemed safe</li> <li>Try and keep eyewitnesses on hand so they can tell police what they saw</li> </ul>
<p><b>H-O-T Procedure</b></p> <p><b>Is it HIDDEN?</b></p> <ul style="list-style-type: none"> <li>Has the item been deliberately concealed or is it obviously hidden from view?</li> </ul> <p><b>OBVIOUSLY SUSPICIOUS?</b></p> <ul style="list-style-type: none"> <li>Does it have wires, circuit boards, batteries, tape, liquids or party-like substances visible?</li> <li>Do you think the item poses an immediate threat to life?</li> </ul> <p><b>TYPICAL</b></p> <ul style="list-style-type: none"> <li>Is the item typical of what you would expect to find in this location?</li> <li>Most lost property is found in locations where people congregate. Ask if anyone has left the item</li> </ul> <p><b>ACT</b></p>	<p><b>Firearms or Weapons Attack - Run, Hide, Tell</b></p>

Before a Licensing Sub-Committee of Trafford Council

In the matter of:

A Review of the Premises Licence Number PLOOO631

and

The O<sub>2</sub> Victoria Warehouse

---

**EXHIBIT GDI/VW/4**

---

I verify that this is the exhibit marked GD/VW/4 in my statement.

Signed:

A large black rectangular redaction box covering the signature of the person verifying the exhibit.

Dated 7/12/23





Before a Licensing Sub-Committee of Trafford Council

In the matter of:

A Review of the Premises Licence Number PLOOO631

and

The O<sub>2</sub> Victoria Warehouse

---

**EXHIBIT GD/VW/5**

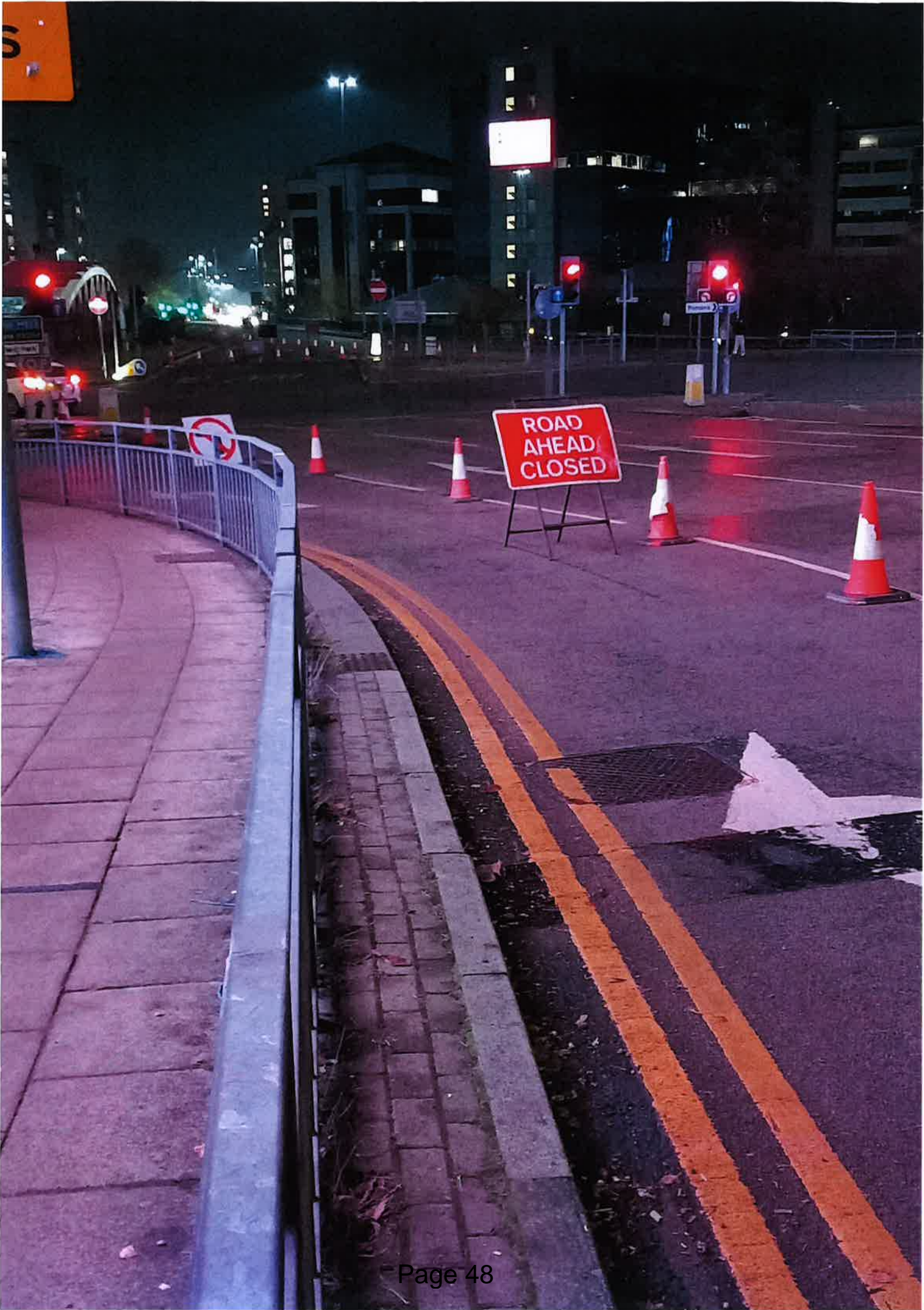
---

I verify that this is the exhibit marked GD/VW/5 in my statement.

Signed:

A black rectangular redaction box covering the signature.

Dated 7/12/23



Before a Licensing Sub-Committee of Trafford Council

In the matter of:

A Review of the Premises Licence Number PLOOO631

and

The O<sub>2</sub> Victoria Warehouse

---

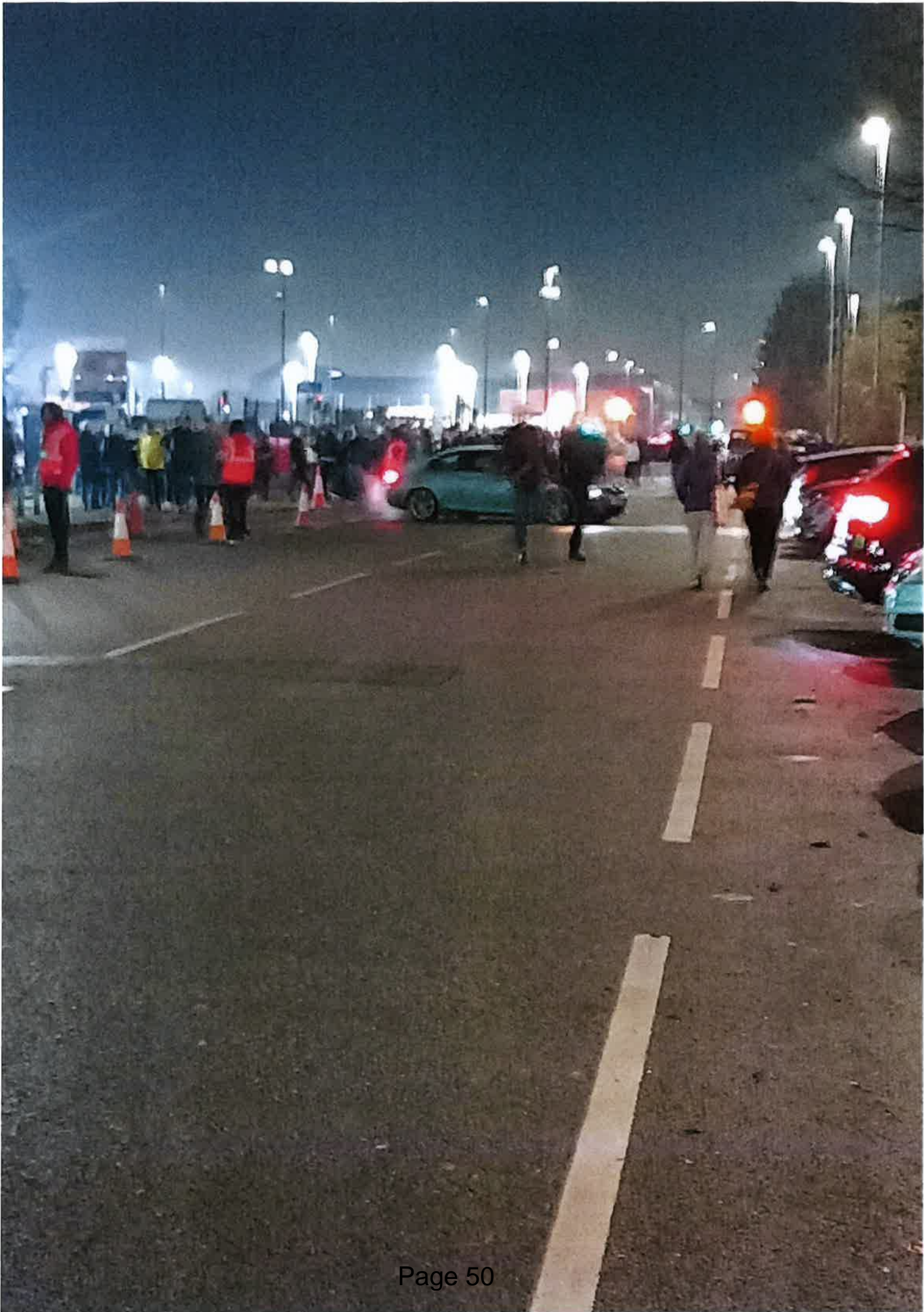
**EXHIBIT GDI/VW/6**

---

I verify that this is the exhibit marked GD/VW/6 in my statement.

Signed: 

Dated 7/12/23



Before a Licensing Sub-Committee of Trafford Council

In the matter of:

A Review of the Premises Licence Number PLOOO631

and

The O<sub>2</sub> Victoria Warehouse

---

**EXHIBIT GDI/VW/7**

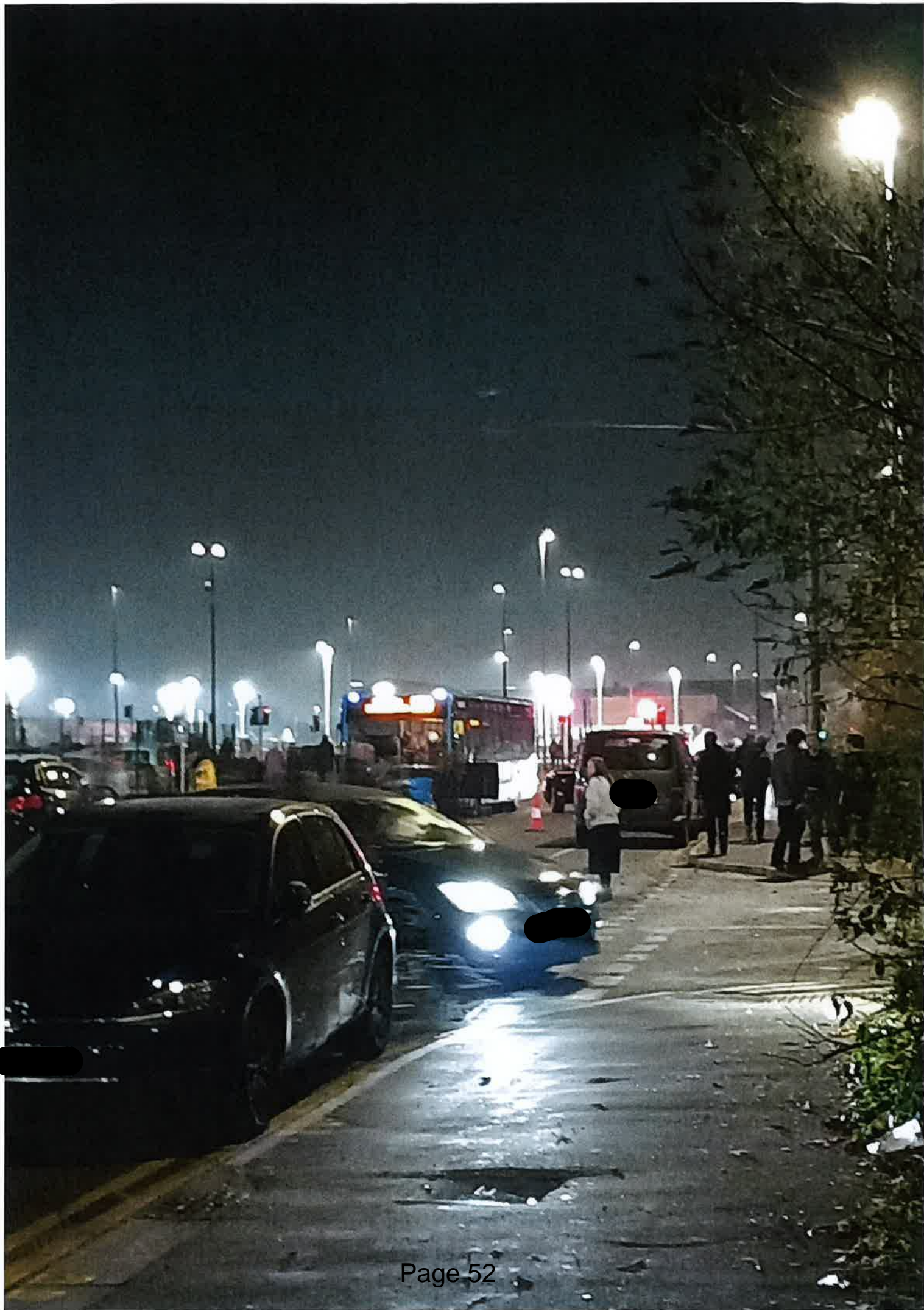
---

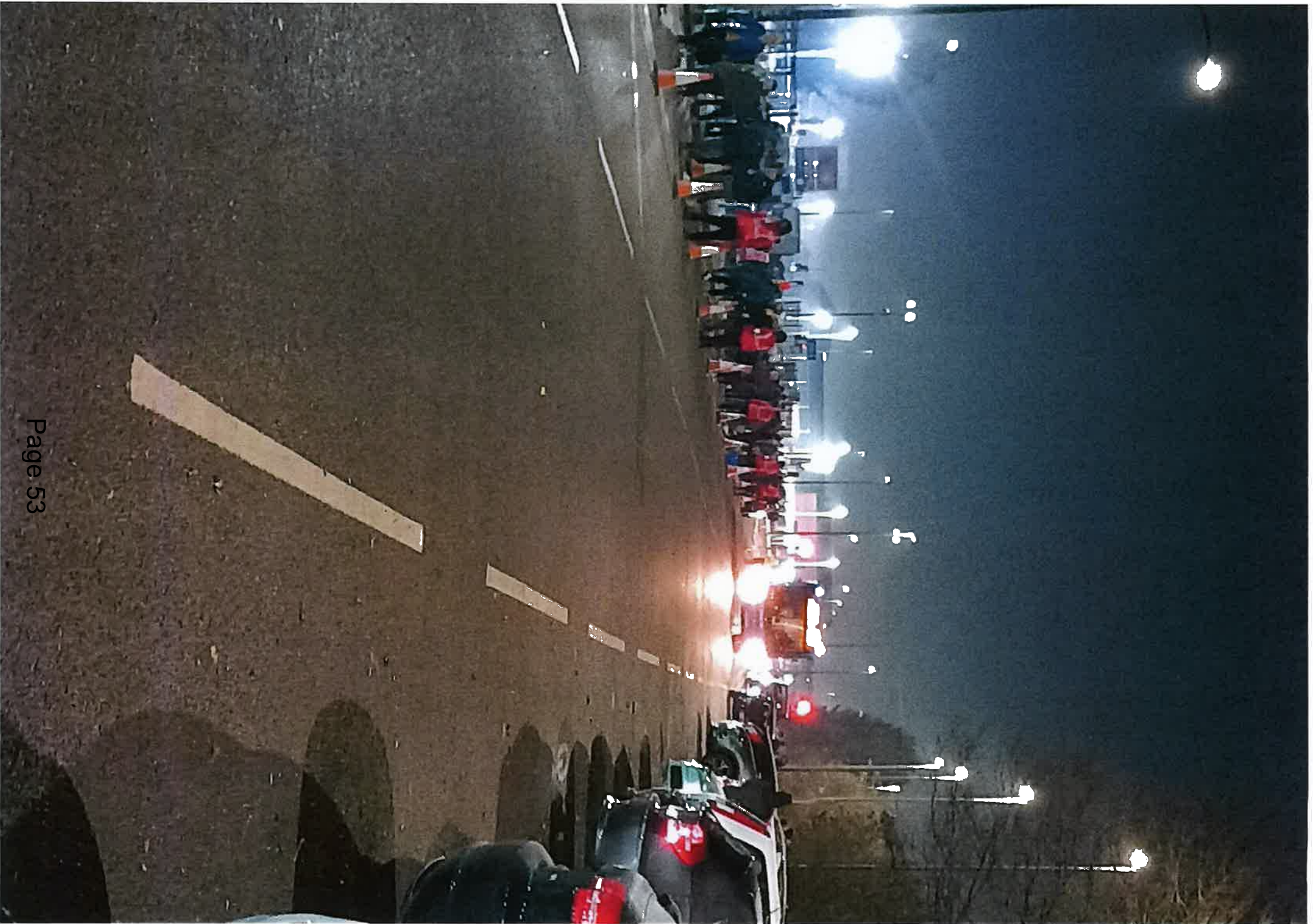
I verify that this is the exhibit marked GD/VW/7 in my statement.

Signed:

A black rectangular redaction box covering the signature of the declarant.

Dated 7/12/23





This page is intentionally left blank





TRAFFORD  
COUNCIL

## STATEMENT OF WITNESS

*(Criminal Procedure Rules, r. 16.2;  
Criminal Justice Act 1967, s. 9)*

### STATEMENT OF James Boles

**Age of witness** "over 18"

**This statement (3 pages) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false, or do not believe to be true.**

I am a licensing enforcement officer for Trafford Council based at Trafford Town Hall, Talbot Road. Stretford.

My role involves the enforcement of licensing legislation and Licensing conditions for licensed premises and the private hire and hackney carriage trade.

On 1st of December 2023 at approximately 1900 hrs I attended at Victoria Warehouse, Trafford Park with two colleagues from Trafford Trading Standard's, Melissa Shine and Alison Courtney.

Victoria Warehouse is a music and event space run by the Academy Music Group Limited. On the above date a music event was being held and approximately 3000 concert goers were expected to attend the event.

The majority of the concert goers were expected to be in their late teens to early twenties.

On arriving at the premises, I noticed that a number of street traders were selling merchandise relating to the artist who was performing that night at the venue. The traders had placed plastic sheeting on the ground and had the merchandise stacked on the sheeting.

I spoke to the traders and asked them if they could show me their street trading licences as they were not acting as peddlers and had in effect set up stalls on the street. One of the traders showed me a Peddlers Licence but I was unable to read it as it was so faded. I then informed the male that as a peddler he should be carrying his wares rather than setting up a stall with his goods laid out on the floor. The male then said that he would pack his goods up and move on, which he did. I then approached the other traders and asked if they had a licence to sell goods. Several refused to engage with me or stated that their licence was in a parked car or with a friend who was working further along the



road. After speaking to the traders for several minutes they all packed up their goods and left the area.

I then spoke to a member of the Vitoria Warehouse security staff and identified myself and my colleagues and stated that I would like to speak the designated premises supervisor Mr Russell Toal as we would like to gain entry to the premises.

A short time later we were joined by the head of security and by Mr Toal and they both escorted us into the premises.

We looked initially at the queuing process and security checks that were taking place. The concert goers were queuing in a car park adjacent to the building and where the customers were now filtered through a maze of barriers before they arrived at the security check points. On the night the process worked very well as the security staff controlled the number of customers approaching the entry point and they also had the facility to add further barriers to increase the number of people queuing if required.

During the time I observed the entry process the security staff checked all bags and used a metal detecting wand on customers as they passed into the building, the security staff engaged with customers and the atmosphere was very convivial. I did ask Mr Toal if a drug dog was in use at the venue and he stated that, a dog was used on "club nights" but was not used on all events and due to the profile of the expected audience a drug dog was not in use on that night.

After entering the building, I asked Mr Toal to show me the bars as I wanted to observe how they were being run and how customers were being dealt with.

We started with the main bar where I spoke to the bar manager who outlined the staff training process and how staff dealt with customers in relation to "challenge 25"

I then spoke to one of the staff members and asked her about the training process and how she would deal with customers.

The member of staff reflected what the manager had told me in regard to the online training process and how customers were dealt with in relation to the sale of alcohol.

I remained at the main bar for approximately 20 minutes, and I noticed that all staff challenged customers when they ordered alcohol and that all the customers I saw being served had to produce their identification and proof of age before they were served. I also noticed that all customers were served alcohol in plastic containers and that all cans and bottles were decanted into plastic containers before being served.

I then moved to the other bars in the venue, and I noticed that the same processes were undertaken in relation to the sale of alcohol.



TRAFFORD  
COUNCIL

After checking the bars we attended at the main office where we were allowed to check the training records of staff which were all digitally recorded on their computer system. I then asked to view the CCTV system on the premises and Mr Toal led me to the CCTV room where I was able to ask the CCTV operators questions concerning the CCTV conditions within the premises licence. The CCTV appeared to be in good working order and the cameras covered all areas of the venue.

At 20.50 hrs we left the venue, and I noticed that the traders had all left the area and the road outside the venue was very quiet.

At approximately 22.00hrs I returned to the venue with Melissa Shine and the first thing I noticed was that the road outside the premises had been closed off with road signs so that a traffic free area could be maintained when the concert goers left the venue.

As I approached the entry point of the venue, I noticed that the street traders had returned and that there were several other traders with them, I would estimate that there were approximately ten traders with concert merchandise on plastic sheeting laid on the ground. Ms Shine and I spoke to the traders, we asked them to produce their licences but the traders refused to show any licenses and tried to avoid any conversations with us as they attempted to sell their goods. My feelings on this occasion were that the atmosphere had changed and the traders were more aggressive towards Ms Shine and I. As I was stood in front of the traders I noticed two males stood behind them. They were dressed in casual sportswear and did not appear to be concert goers. I tried to engage them in conversation asking them if they were with the street traders, the two males refused to speak to me, I assume that they were there to protect the street traders or that that they were there to monitor the selling the merchandise by the traders.

Ms Shine and I then moved down the road towards the junction of Trafford Park Road and Trafford Road where the second road closure had been put in place.

Trafford Park Road was very busy with concert goers leaving the venue and there were a large number of private hire vehicles and hackney carriages waiting to pick up customers, I would estimate twenty to 30 vehicles in the controlled area. I approached several of the vehicles and asked them if they had a booked fare. Any private hire vehicles who did not have a booking or any hackney carriages that was not licensed by Trafford, but were looking for a fare, I spoke to, and requested that they leave the area as they would be committing an offence of plying for hire. A few of the vehicles complied with my request but as I was moving down the road, I noticed several of the vehicles had accepted fares and were now driving off.

Unfortunately, most of the vehicles who were pointed in the direction of Trafford Park decided that they would do a 3 point turn in the road and drive towards Salford and Manchester.

Due to these manoeuvres several pedestrians narrowly avoided colliding with the



TRAFFORD  
COUNCIL


vehicles and many of the drivers then attempted to drive through the traffic management barriers at the Trafford Road junction.

On arriving at the Trafford Road junction, I noticed that the road was heavily congested with vehicles the majority of which were private hire vehicles and hackney carriages. The vehicles were backed up from the junction of Trafford Park Road and Trafford Road and along the dual carriage way of the A5081 towards Manchester United ground. Many of the private hire and hackney vehicles had simply stopped in the road and were waiting to pick up fares ignoring the traffic lights as they changed and the road markings which are all double yellow lines at this location.

Ms Shine and I then spent the next 30 minutes telling the drivers to move on and that they were committing offences by stopping in that location. Many of the drivers moved on a few yards and again parked up waiting for fares and continuing to block the traffic lanes. Some of the drivers informed me that they had pre booked fares but only one out of over 20 drivers I challenged could show me a pre booked fare on his mobile hand device.

It was approximately 23.00hrs before the crowd dispersed and it was only at this time that the number of taxi drivers in the area thinned out.

If I was to describe the situation at the junction of Trafford Park Road and Trafford Road I would say that due to the behaviour of the taxi trade the situation for concert goers and other road users very quickly became chaotic and dangerous. We left the area at approximately 23.15hrs.

Signed:  (witness)

Date: ...07/12/23.....

(To be completed if applicable: ..... being unable to read the above statement I, .....of ....., read it to him/her before he/she signed it.

Signed: ..... Date: ..... )

In the matter of:

A Review of the Premises Licence Number PLOOO631

and

The O<sub>2</sub> Victoria Warehouse

---

Statement of Max Martin

---

1. I am Max Martin
2. I am an Environmental Health Officer employed by Trafford Council. My duties include enforcement of legislation in relation to Food Hygiene, Public Health, Health and Safety at Work and Animal Welfare.
3. On Wednesday 29<sup>th</sup> November 2023 at approximately 19:00, I attended Victoria Warehouse, Trafford Wharf Road, Trafford Park, M17 1AG with my colleagues to carry out an unannounced inspection during the 'Sleaford Mods' concert. During the visit I was accompanied by:
  - a. Mrs. Nicola Duckworth, Team Leader Environmental Health (Safety at Sports Grounds Lead).
  - b. Mrs. Alison Acton, Environmental Health Officer.
  - c. Mr. Graeme Dixon, Environmental Health Officer.
  - d. Mrs. Georgia Herbert, Environmental Health Regulatory Support Officer.
4. When we arrived, Mrs. Duckworth introduced herself to the stewards and two supervisors stood at the entrance gates of the 'E3' carpark – the main entrance being used for the event that day. Mrs. Duckworth stated that we were all officers from Trafford Council and that we were there to conduct an unannounced inspection. The members of staff at the gate informed us that they had a radio, but it was broken. We therefore had to wait a short while whilst the message that we had arrived was relayed to management. Once management were informed of our arrival, an individual known as Manos Chatzakis lead us into the venue and into a management office.
5. In the management office, we were introduced to:
  - a. Russell Taylor-Toal, Venue Manager
  - b. Phil Noe, Project Manager and Head of Security at Compact Security Services.
6. Mrs. Duckworth explained the reason for our visit and requested a copy of all the documentation relating to the event being held that night.
7. My colleagues and I left the management office to review the documentation.
8. My colleagues and I split up into groups so that we were able to cover differing core aspects of the event. I joined Mr. Dixon in reviewing the stewarding and security for the event. We were informed by management that we were due to be supervised at all times

whilst on site. Mr. Dixon and I were therefore escorted around the premises by Phil Noe from this point forward.

9. To start the review of the stewarding and security, Mr. Dixon and I began speaking to the stewards and supervisors at the front gate of the car park. Phil Noe informed us that staff wearing the red hi-vis jackets were stewards/SIA staff and the staff in blue jackets were the designated supervisors.
10. I first accompanied Mr. Dixon in the questioning of [REDACTED]. Mr. Dixon asked the questions and made notes on [REDACTED] answers, I only listened. I refer you to the statement of Mr. Dixon. [REDACTED] started talking about the use of an overflow lane if it was needed for the event, outside of the normal queuing area in the 'E3' carpark. I witnessed a male individual calling [REDACTED] away from myself and Mr. Dixon during our conversation. The male individual looked to be working for the venue as he was wearing a body camera. The male individual said something to [REDACTED] and was shaking his head at the same time. After this incident, [REDACTED] no longer spoke about the overflow lane that was mentioned previously.
11. I then went away and spoke with [REDACTED] SIA licensed security staff. When questioned, he stated his role was primarily to check for intoxication and refusal of entry if deemed too intoxicated. He informed me that he had sufficient training in first aid, counter terrorism and physical intervention. He had been employed with Victoria Warehouse for roughly 2 months and had previous experience working in a security role for 'G4S'. He informed me that a pre-show briefing had taken place and that it had covered the venue capacity, expected crowd, vulnerable people and accessibility requirements. He was suitably able to state that he would alert his nearest supervisor in an emergency situation and was able to point towards his nearest supervisor. I recorded in my PACE notebook all the details that the staff provided when questioned. Mr. Dixon was speaking with other members of staff during this time.
12. I then also spoke with [REDACTED] at the front gates. He stated that his role involves crowd control and directing people to the correct locations. He informed me that he was SIA licensed but was waiting for his badge to be sent to him and so was working as a normal steward in the meantime. He told me that he had training in counter terrorism, first aid and had been employed for roughly 6 months. [REDACTED] said that he had attended the briefing and that they were informed of the expected crowd type. He was also able to state that he would alert his nearest supervisor in an emergency situation and was able to point towards his nearest supervisor.
13. Mr. Dixon and I moved on from the front gate and spoke with Mrs. Duckworth who was nearby and observing the searching of attendees at ingress. I then headed inside of the venue with Mr. Dixon and Phil Noe.
14. Inside of the venue, we spoke to [REDACTED] stewarding the female toilets. I refer you to the statement of Mr. Dixon.
15. We then headed into the outside yard with the smoking area. In the smoking area, I spoke to [REDACTED] steward. When questioned, [REDACTED] informed me that his only role for the entire event is crowd control of the smoking area. [REDACTED] stated that he has only been an employee for 2 months and when asked, he stated that he had no counter terrorism training.
16. I then moved on and spoke to [REDACTED] SIA licensed security staff. [REDACTED] was in the yard, guarding the gate that lead through to an office and a first aid area. He stated that he has received his counter terrorism training and is also working towards a CCTV qualification. He was suitably able to state that he would alert his nearest

supervisor in an emergency situation and was able to point towards his nearest supervisor.

17. Before we moved back inside, Mr. Dixon came and informed me that he had just dealt with an urgent issue involving the emergency gates in the yard. I refer you to the statement of Mr. Dixon.
18. When I entered the building, I interviewed [REDACTED] a steward monitoring the male toilets and corridor activity. He stated that he has received counter terrorism and first aid training. He had attended the briefing and was able to inform me of the emergency procedure and his nearest supervisor. He also informed me that the toilet checks are carried out every 30 minutes and when they are completed, he will then send a text message to a supervisor detailing any issues found.
19. We were escorted up to the mezzanine level as it was closed for this specific event. Whilst upstairs I questioned [REDACTED] SIA licensed security. He informed me that his role was to ensure that no attendees enter the staff only door and to also ensure the safety of the attendees who were in the accessible seating. [REDACTED] told me that he had been employed for 2 months and had received counter terrorism training. He had attended the briefing and was able to inform me of his nearest supervisor. I asked him what his specific role would be in the case that an amber or red alert was called and he wasn't able to tell me. He informed me that he was sure that other members of staff on the mezzanine will know of what to do but he personally did not.
20. I, Mr. Dixon, Mrs. Duckworth and Mrs. Herbert all met up and discussed the findings of the visit so far. We observed the crowd and the security from the balcony whilst the 'Sleaford Mods' began their act.
21. Mr. Dixon and I then conducted checks on all of the bar areas in the venue. All bars had suitably hot water in their wash hand basins. Some wash hand basins only had hand sanitiser and not hand wash available. There were also no disposable towels available for staff to dry their hands at any of the bars within the venue. My colleagues and I regrouped and left the site.
22. I then returned at 10:15pm with Mrs. Duckworth and Mr. Dixon to observed egress of attendees from the venue. I observed that Trafford Wharf Road had begun to be closed with traffic cones. However, several hackney taxi cabs were already present outside of the venue as they had arrived before the road closure had taken place. Opposite the venue there was a large collection of parked cars, many of these were attendees of the event and proceeded to drive very close to pedestrians as they navigated out of the road closure. A bus was also allowed through the road closure after being granted permission by Manos Chatzakis.

#### Statement of Truth

23. I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

06/12/23



Max Martin



**MANCHESTER MAGISTRATES COURT**

Case No:

BETWEEN:

**TRAFFORD COUNCIL**

Applicant

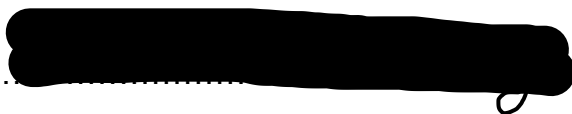
**-v-**

Respondent

-----  
**STATEMENT OF ALISON COURTNEY**  
-----

1. My name is Alison Courtney and I am employed by Trafford Council as a Trainee Trading Standards Officer in the Trading Standards department of the Place Directorate, at Trafford Town Hall, Talbot Road, Stretford, Manchester, M32 0TH.
2. I am authorised by Trafford Council to enforce consumer protection legislation including the provisions of the Consumer Rights Act 2015,
3. On 1<sup>st</sup> of December 2023 at approximately 1900 hours I attended at Victoria Warehouse, Trafford Park to assist and observe officers Melissa Shine from Trafford Trading Standards and James Boles from Trafford Licensing Enforcement.
4. I observed concertgoers arriving by taxi at ingress and queuing to enter the premises.
5. Outside the premises near the road, there were street traders selling merchandise stacked on plastic sheeting on the ground. James asked to see their trading licenses and he was not satisfied that the licenses or lack thereof were sufficient for the traders to continue selling. The traders were asked by James to pick up their merchandise and cease sales, and they packed up and left.

6. I observed as James asked a member of security staff to speak to the premises supervisor and we were joined by a male who identified himself as such and also by the head of security.
7. We were escorted into the premises and shown around. We visited the area inside the venue designated for WelSafe staff and Melissa spoke to a woman who identified herself as head of the programme during the event.
8. We were then escorted to the bars that were in operation at the time, and I observed staff selling alcoholic and non-alcoholic drinks. I observed Challenge 25 signs posted on the walls behind the bars. I also observed drinks being decanted into plastic cups prior to being served to customers.
9. The concert was ongoing while we were inside the venue and there were concertgoers dancing to the music and coming and going from the bars and toilets.
10. We were then escorted into an office area where we were shown the training application for the bar staff and Melissa asked questions of the manager about how and at what frequency the staff was delivered the training.
11. At about 20:50 we left the venue and I proceeded back to my vehicle and left the area.
12. I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth

.....  


Signed by

Date 7<sup>th</sup> December 2023

Case No:

BETWEEN:

**TRAFFORD COUNCIL**

Applicant

-v-

**Victoria Warehouse**

Respondent

---

**STATEMENT OF MELISSA SHINE**

---

1. My name is Melissa Shine and I am employed by Trafford Council as a Senior Fair Trading Officer in the Trading Standards department of the Place Directorate, at Trafford Town Hall, Talbot Road, Stretford, Manchester, M32 0TH. I am authorised by Trafford Council to enforce consumer protection legislation.
2. On Friday the 1<sup>st</sup> of December 2023 at approximately 19:00hrs I attended a business trading as Victoria Warehouse on Trafford Wharf Road, Trafford Park, M17 1AB with colleague Alison Courtney, trainee Trading Standards Officer of Trafford Council and James Boles, a Licensing Enforcement Officer of Trafford Council.
3. Outside the business at the time of my visit, at the entrance/exit gates to the venue trading as Victoria Warehouse, were individuals offering items of clothing for sale. The items were on the floor. James Boles requested that the individuals provided their street trading licence for inspection. As the individuals were unable to produce the necessary documentation they were advised by James Boles to pack up the items and move on. The individuals did pack up the items and left.

4. Upon entry to the business trading as Victoria Warehouse on Trafford Wharf Road, Trafford Park, M17 1AB we met several members of staff, including a male who identified himself as Russell, the designated premises supervisor and a male who identified himself as Phil Noe.
5. We were escorted around the venue by several members of staff. I conducted observations whilst in the venue of the bar areas in operation. The venue operates a challenge 25 policy. I observed some customers provide forms of identification to verify their age to bar staff.
6. Before leaving the venue Russell asked if the business would receive any feedback or recommendations following our visit. I advised Russell that any advice or recommendations from Trading Standards following the visit, would be made in writing. Russell enquired about my earlier pricing questions and was receptive to advice as he explained that he is heavily guided and steered by senior management and would welcome advice from Trading Standards. James, Alison and I left the venue and later left the area.
7. I returned to Trafford Wharf Road, Trafford Park, M17 1AB later that evening at approximately 22:10 hrs with James Boles.
8. On approach to the front of the venue trading as Victoria Warehouse, a road closure was in place on Trafford Wharf Road. Customers of the venue were exiting, and a number of individuals were present at the entrance/exit point, with items of clothing for sale, laid out on the floor, offering them for sale. James Boles approached the individuals and requested sight of their street trading licences. The individuals were hostile to James and I. Individuals that were advised to pack up earlier in the evening by James Boles had returned. One female was verbally aggressive towards me as I attempted to photograph the clothing offered for sale. The traders refused to pack up and move on and continued to make sales with customers exiting the venue.

9. James and I walked further along Trafford Warf Road, towards the junction with Trafford Road and observed more individuals offering clothing products for sale, which were placed on the floor by the roadside.
10. Several individuals leaving the venue trading as Victoria Warehouse appeared to walk towards Trafford Road and congregated at the pedestrian crossing at the end of Trafford Warf Road. I observed vehicles park up on lane one of Trafford Road, a live lane of traffic, blocking the lane, often blocking the pedestrian crossing and blocking the road exit points from Trafford Warf Road to Trafford Road. As lane one was predominately blocked, drivers stopped in live lane two of Trafford Road and attempted to collect passengers.
11. James Boles asked drivers including those of private hire and hackney vehicles to move on as they were causing a hazard and nuisance. I assisted. Some drivers complied with the request, but others were obstructive and refused to move.
12. We left the area at approximately 23:15hrs.

Statement of Truth

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

  
.....  
Signed by

Date 8th December 2023

This page is intentionally left blank