

FULL STEAM TRADING LTD

**APPLICATION FOR REVIEW OF A PREMISES
LICENCE**

**THE ARCHIVES
UNIT 10 HIGH CROSS CENTRE
FOUNTAYNE ROAD
TOTTENHAM
LONDON N15**

**RESPONDENT'S BUNDLE FOR LICENSING SUB-
COMMITTEE HEARING 9 JULY 2026 AT 19:00
(ONLINE)**

Full Steam Trading Ltd
Application for review of a Premises Licence
The Archives
Unit 10 High Cross Centre
Fountayne Road
Tottenham
London N15

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Councillors da Costs, Brands, and Small
Licensing Sub-Committee
Haringey Council
c/o Haringey Licensing Team
By email only
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7 July 2026

Dear Councillors,

Our Client: Full Steam Trading Ltd – Application for Review of a Premises Licence – Licensing Sub-Committee Hearing 9 July 2026 at 19:00 (Online)

My name is Luke Elford, I am the Licensing Solicitor representing Full Stream Trading Ltd (“the Premises Licence Holder”) in relation to the Application for Review (“the Application”) of its Premises Licence (“the Premises Licence”) at The Archives, Unit 10, High Cross Business Centre, Fountayne Road, Tottenham, London N15 4QN (“the Premises”).

I thought it would be helpful to write to you, as well at the Responsible Authorities and the Other Person bringing the Application in advance of Thursday’s hearing regarding the Application and where the Premises Licence Holder stands in respect of it. I hope that this letter is useful.

The first thing to say is that the Premises Licence Holder today, is not the same as the Premises Licence Holder in the period leading up to the Application. It is the same company name, but that is where any similarity stops. There are two new directors of the company in the persons of Mr Spencer Wyatt (“Spencer”) and Mr William Wintour (“William”). Spencer and William became involved at the Premises after the building’s ownership were notified of the Application when the previous management of the venue effectively absconded.

The second thing to say; and this may strike you as an anomaly in respect of an application for review of a premises licence, which are usually contentious and adversarial proceedings, is that the Premises Licence Holder (as is) fully supports the Application and welcomes engaging in the process with a view to promoting the Licensing Objectives. It is quite clear from the paperwork and evidence that the Premises Licence Holder has seen that members of the public were being disturbed by operation of the Premises and that the Licensing Objective of the prevention of public nuisance was being undermined. The Premises Licence Holder cannot do anything to undo what has gone before, but it can endeavour to show all parties how it will work to promote all of the Licensing Objectives moving forward.

To that end, the Premises Licence Holder is not challenging any evidence that the Licensing Objectives were undermined that pre-dates the involvement of Spencer and William. In the Premises Licence Holder's evidence pack, you will find a statement from each detailing their background and the work that they have done, post-appointment, to seek to turn things around.

The Licensing Act 2003 ("the Act") is a permissive regime and the actions that can be taken by the Licensing Authority in response to an application for review of a premises licence under section 51 of the Act are well-known. You, the Licensing Sub-Committee can:

- (a) Take no action at all
- (b) Modify the conditions of the licence (either permanently or for up to 3 months)
- (c) Exclude a licensable activity from the scope of the licence (either permanently or for up to 3 months)
- (d) Remove the designated premises supervisor
- (e) Suspend the licence (for any period not exceeding 3 months)
- (f) Revoke the licence.

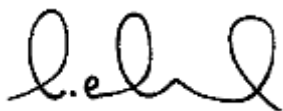
Additionally, because this is an application for review that concerns public nuisance from live and/or recorded music, the Licensing Sub-committee can¹ add conditions regarding regulated entertainment (live music and recorded music) during periods when those activities might necessarily be deregulated.

At the Licensing Sub-Committee hearing, the Premises Licence Holder will be asking you to deal with the Application by determining to modify the conditions of the Premises Licence and will make suggestions as to how that might be done to promote the Licensing Objectives.

For now, I commend to your reading and contemplation the papers that we have submitted on behalf of the Premises Licence Holder, and I look forward to addressing you, albeit electronically, in-person on Thursday.

With my best wishes.

Yours sincerely,



Luke Elford
Partner
Keystone Law

¹ under section 177A of the Act



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Application for Review of a Premises Licence

Statement of Mr. Spencer Wyatt

1. My name is Spencer Wyatt. I am making this Statement in response to the application for review (“the Application”) of the premises licence (“the Premises Licence”) at The Archives (“the Premises”).
2. I am a director of Full Steam Trading Ltd (“the Premises Licence Holder”). I became a director on 3 June 2026 at the invitation of the owners of the building where the Premises is.
3. I was brought onboard when the owners of the building became aware of the Application; the previous management team having left abruptly having been challenged regarding their mismanagement of the Premises.
4. In this Statement I am going to:
 - a. Explain who I am and my background in venue management
 - b. Set out what I found when taking over the Premises
 - c. Provide details of what I have done to address my findings
 - d. Explain my ethos as regards the promotion of the Licensing Objectives
 - e. Suggest how the Licensing Sub-Committee might wish to determine the Application.

5. I sincerely hope that this Statement is useful to the Licensing Sub-Committee (“the Committee”) and I will be attending the Licensing Sub-Committee hearing on 9 July 2026 where I am happy to answer any further questions the Committee may have about anything I have said herein.

My background

6. I have worked in the hospitality industry since 1988 and have over 35 years’ experience managing some of London and the Southeast’s largest late-night venues.
7. I began my career as a bars manager before becoming a duty manager and moving into venue operations management positions. My work history is provided at **Appendix A**.
8. Since 2005 I have worked with Egg London in King’s Cross. Egg London is one of London’s most highly regulated licensed venues.

My findings upon arrival at the Premises and what I have done in relation to them

9. I was made aware of the Application and also concerns expressed by the Police Licensing Team regarding alleged breaches of conditions of the Premises Licence.
10. I located the Premises Licence and familiarised myself with the hours and conditions of it.
11. My immediate priority was to stabilise the operation of the Premises, ensuring full compliance with the Premises Licence and to seek to regain the trust and confidence of the Responsible Authorities, particularly the Police Licensing Team.
12. I began by immediately cancelling all events at the Premises that were scheduled to use the Premises outside area. Although this has resulted in a substantial financial loss to the business it was clear to me that external events were the primary cause of the concerns leading to the Application. The financial hit in terms of refunded deposits and cancelled bookings was significant.
13. I carried out a full review of the Premises Licence and each of the issues that I was aware of to see where other problems were.

14. It was apparent that many of the issues stemmed from documentation either being unavailable or not being maintained in compliance with the conditions of the Premises Licence.
15. I had significant difficulty locating the relevant documents to piece things together, but this was done and I have been reviewing the documentation line-by-line to identify what works and what does not. In due course I will be completing a comprehensive overhaul of the documentation, but this will take some time. From what I have seen thus far, this was not a situation where the documents were particularly lacking, but rather a situation where the documents (and therefore the rules) were routinely ignored.
16. The management team of the Premises departed the Premises prior to my appointment. It was difficult to work out who the staff were, find their employment and training records, and whether or not they had been paid for their work.
17. I took the view that the Premises needed a fresh start and I have therefore recruited a new staff team for the Premises.
18. This necessitated comprehensive training for all of the new staff members commensurate with their roles at the Premises. I put together a comprehensive training package that covered:
 - a. The Licensing Act 2003 and the four Licensing Objectives
 - b. The revised style of operation of the Premises including the move away from external events
 - c. The conditions of the Premises Licence and what they mean in real terms
 - d. Bar operation and management
 - e. Responsible retailing of alcohol
 - f. Refusing service and how this must be logged
 - g. Age verification (Challenge 25) procedures and acceptable forms of identification
 - h. Customer vulnerability

- i. Spiking
 - j. Fire Safety and Evacuation procedures
19. I am arranging for all members of staff to complete Welfare and Vulnerability Engagement (WAVE) training to improve customer welfare standards.
 20. I conducted a review of the security (“SIA”) provision at the Premises.
 21. Having conducted that review, I was of the opinion that the SIA provision at the Premises was unsuitable and not of the standard that I would expect for a venue. I therefore dismissed the incumbent SIA provider replacing them with No Ordinary Guard Security who I have worked with previously and who I know to provide good quality SIA provision to large venues.
 22. Prior to dismissing the incumbent SIA provider, I requested from them all relevant documentation pertaining to SIA provision at the Premises. I did this because one of the identifiable concerns was that SIA documentation was not available or up to date.
 23. The new SIA provider (No Ordinary Guard Security) has already supplied comprehensive documentation as follows:
 - a. Security risk assessments
 - b. Suggested deployment procedures
 - c. SIA licence records
 - d. Colour copies of SIA licences for each SIA provided
 - e. Individual SIA details (full name, date of birth, home address, contact details etc.)
 24. These records are maintained on site and available for inspection by Responsible Authorities as they should be.
 25. The Premises has been operational under my guidance since the start of June. I arranged that I be appointed as the Designated Premises Supervisor (“DPS”). This is a role that I have fulfilled throughout my career and one that I take seriously. The

DPS at any large or late-night venue is crucial. It is clear that the previous DPS and management team were sub-optimal and not up to standard.

26. During my first week at the Premises, I contacted both the Licensing Authority (the Licensing Team) and the Police Licensing Team. I did this to let them know of my appointment, to introduce myself, and to begin the process of re-establishing trust and partnership working relationship with the Responsible Authorities. I will explain more about my approach to working with the Responsible Authorities under the relevant heading of this Statement.
27. Initial meetings were held and documentation provided. Naturally, I could not do anything about the extant Application, but these initial meetings seemed to be positive.
28. A further meeting was held where I, and my fellow director William Wintour, explained our longer-term vision for the Premises. We explained that:
 - a. All external events had been cancelled
 - b. Any events that we deemed “high risk” would not proceed
 - c. Future programming at the Premises would focus on responsible, well-managed events that contribute positively to London’s nightlife and the local area.
29. I accept that there is still work to do, but I can assure the Committee that I am doing everything I can to ensure that this Premises operates responsibly and promotes the Licensing Objectives.
30. Over the coming weeks I will be continuing to review and improve the Premises’ operational procedures. This includes:
 - a. A line-by-line review of all of the venue’s policies and procedures – I will start with the policies that are required by the Premises Licence before moving on to other policies
 - b. Reviewing and updating the risk assessments for the Premises
 - c. Improving the Premises’ incident reporting procedures and protocols – one of the things that I have done is to begin sending weekly updates to the Police Licensing Team. I believe in complete transparency about what

happens at a venue, and this is a practice that I have undertaken at Egg London to great effect previously. I see no reason why it cannot assist here.

- d. Upgrading and improving the CCTV system
- e. Strengthening compliance monitoring including conducting internal audits
- f. Developing and enhancing staff training, identifying any training needs for specific staff members, and actioning those

31. Compliance is not a one-off process; it is an ongoing commitment.

My ethos and approach to the Licensing Objectives

32. I would hope that it is apparent from the above that I view compliance and the promotion of the Licensing Objectives as paramount and that I take my responsibilities seriously indeed. If it is not, please be assured that is how I see things.
33. My ambition is to take the Premises from where it found itself and to turn it around into a venue that is recognised for its professionalism, safety, and positive engagement with the community.
34. To the residents who have been disturbed by the previous operation of the Premises – I can only apologise. Would that I had become involved in this venue sooner as I completely understand the negative impacts that poorly run Premises can have on private and family life. It is impossible for a venue of the size of the Premises to be impactless, but I will do all that I can to ensure that impacts from the venue are minimised to an extent that you find acceptable.
35. Whilst my aim is that you are never disturbed, I would like you to know that my door and lines of communication are open to you. I am going to be arranging a series of regular residents' meetings, the purpose of which is two-fold:
- a. To seek your invaluable feedback on the operation of the Premises and any impact on the local area; and
 - b. To keep you informed of our upcoming activities, what those will comprise, and what you can expect from us.

36. Dialogue is a two-way street so I sincerely hope that you will avail yourselves of engaging in these meetings. I look forward to meeting as many of you as possible. In over 35 years of managing licensed premises in residential areas, I have always recognised that maintaining good relationships with neighbours is essential.
37. I will also be working with our partners within the Police and other Responsible Authorities. I explain above how I have instituted a practice of self-reporting on incidents and this will continue.
38. As to the prevention of public nuisance, I am looking at all possible measures to prevent noise leakage from the venue. I was particularly concerned by the previous operation's queuing and dispersal practices. The queueing procedures have already been changed, and I have been conducting overnight observations to assess more practical dispersal procedures.

Conclusion and request to the Committee

39. Neither I, nor William, can undo what has gone before. We agree that the Licensing Objectives have been undermined and we agree that it is appropriate and proportionate for the Committee to view the fact that the Licensing Objectives were undermined seriously. We hope, however, that it is abundantly clear that what has gone before, will not continue under moving forward.
40. That being the case, we invite the Committee to deal with the Application by modifying the conditions of the Premises Licence.
41. We believe that the Premises (as it is today) is fundamentally different from what went before. The two are worlds apart. We are of absolute conviction that we are now and will continue to promote the Licensing Objectives.
42. We do not need to tell the Committee how difficult and fragile the hospitality industry is currently. We will say, however, that the future of this venue stands at a critical junction.
43. Thank you for taking the time to read this Statement.

Appendix A

SPENCER WYATT – WORK HISTORY

Bars Manager

- Hollywoods, Romford – 1988 to 1990
- Zen, Dartford – 1990 to 1992
- Palladium – 1992 to 1996

Duty Manager

- Limelight, Westminster – 1996 to 2000
- Scala, Camden – 1996 to 2000

General Manager

- Pacha, Westminster – 2000 to 2005
- The Cross, Camden – 2000 to 2005
- Bagley's, Camden – 2000 to 2005

Venue Operations Director

- Egg London, Islington/Camden – 2000 (ongoing)
- The Archives/Club 360, Haringey – June 2026 (ongoing)

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Application for Review of a Premises Licence

Statement of Mr. William Wintour

1. My name is William Wintour. I am making this Statement in response to the application for review (“the Application”) of the premises licence (“the Premises Licence”) at The Archives (“the Premises”).
2. I am a director of Full Steam Trading Ltd (“the Premises Licence Holder”). Like my fellow director, Spencer Wyatt (“Spencer”), I was brought in by the building owners when they became aware of the concerns expressed in the Application.
3. It may interest the Licensing Sub-Committee to note that, in addition to my role as a director of the Premises Licence Holder, I am also a local resident. I live some 50 metres from the Premises. I too was disturbed by the operation of the Premises, and I have absolute sympathy with the Application and why it has been brought.
4. In this Statement I am going to explain how I became involved with the Premises, who I am and my background, and my future hopes for the Premises. My fellow director, Spencer will deal with his operational observations regarding the Premises, and I invite you to read his Statement because it sets out so much of the good work that he has done since our appointment.
5. I was originally asked by the owners of the building to look at the noise breakout from events that were held externally at the Premises. My findings back up all the concerns expressed by those supporting the Application. I relayed this back to the building owners who responded by asking whether I would be willing to take on the Premises. I was not immediately aware but having been presented with my findings regarding disturbance to the local community, the previous management of the

Premises had downed tools and left abruptly creating a vacuum that I was able to step into.

6. I was instrumental in securing Spencer to come in and oversee operational matters. My focus has been on programming and what the future holds for these Premises.
7. I have over 26 years' experience in music and events. Combined with Spencer we have over 50 years of venue and events management experience.
8. My career has encompassed everything from intimate (200 person) events to the management of festivals attracting tens of thousands of attendees. I have successfully started, developed, and loved event brands spanning a plethora of musical genres.
9. During my career I have collaborated with and partnered with some of London's most iconic venues:
 - a. Ministry of Sound
 - b. Fabric
 - c. Egg London
 - d. 93 Feet East
 - e. Café 1001
 - f. Club Aquarium
 - g. Herbal
 - h. Cargo
 - i. 558
 - j. Dalston Superstore
 - k. Village Underground
 - l. Fire
 - m. Light Box
 - n. Area
10. My background in events and events management led to me being offered the opportunity to take over the Old Bath House in Hackney. Via a community interest company (CIC) I took up the role of Events Director in 2008 with responsibility for everything ranging from event programming to noise management.
11. My work with the Old Bath House is particularly relevant to the Application.

12. Like the Premises, when I inherited the Old Bath House, it came with its own challenges. There had been numerous noise complaints about the Premises due to events that had been held there and managed poorly.
13. In a similar vein, the Old Bath House is located in close proximity to residential properties and concerns had been expressed about both music noise and customer dispersal. I assessed the operation of the Old Bath House and took the view that change was needed. I transformed the venue into “The Wick.”
14. The Wick emerged as a vibrant hub – a fusion of a farmers’ market, boutique shopping, street food, and entertainment. The concept embraced “community” and played a pivotal role in the overall regeneration of Hackney Wick. I believe this ethos is what was previously lacking at the Premises and that is what I hope to achieve at the Premises.
15. I would like the Premises to replicate the success of The Wick, and I feel that we are ideally placed to do so.
16. It is unfortunate, but not unsurprising, that we find ourselves in the position we are in. I wish that I could have become involved with these Premises sooner. Had that been possible, the Premises might not be facing a review of its licence.
17. It is my hope for the future that the Premises is able to retain its licence, modified as necessary to promote the Licensing Objectives and that I am, and Spencer is, afforded an opportunity to take this Premises forward in a way that works for everyone as a community hub.
18. Thank you for reading this Statement. I will be attending the Licensing Sub-Committee hearing on 9 July and I look forward to expounding on what I have said then as well as answering any questions the Committee may have.

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Application for Review of a Premises Licence

Suggested Conditions

The Premises Licence Holder recognises that certain modifications to the Premises Licence are appropriate and proportionate to promote the Licensing Objectives.

The Existing Premises Licence is comprehensive in so far as it addresses the Licensing Objectives, but additional conditions to address the specific concerns in the application for review of the Premises Licence can be considered by the Licensing Sub-Committee. The Premises Licence Holder makes the following suggestions.

1. Regulated Entertainment in the form of Live and Recorded Music shall not be provided in external areas of the Premises. **Section 177A of the Licensing Act 2003 shall not apply to this condition.**
2. The Premises Licence Holder shall maintain a hotline number for all events taking place at the Premises.
3. The hotline number shall be provided to the Licensing Authority and displayed on any social media or communications regarding events.
4. The Premises Licence Holder shall keep a log (which may be electronic) of all calls received by the hotline number, including the name of the caller (if given) and a brief description of the issue. The log shall be kept at the Premises and made available to Responsible Authority Officers on request.

5. The Premises Licence Holder shall maintain a hotline email address for all events taking place at the Premises.
6. The hotline email address shall be provided to the Licensing Authority and displayed on any social media or communications regarding events.
7. The Premises Licence Holder shall keep a log (which may be electronic) of all emails received by the hotline email address, including the name of the sender (if given) and a brief description of the issue. The log shall be kept at the Premises and made available to Responsible Authority Officers on request.
8. Both the hotline number and email address shall be monitored for the duration of any event by a competent person appointed by the Premises Licence Holder.
9. The logs for both the hotline number and hotline email address shall be kept for a period of 12 months from the date of call or email before they may be discarded.
10. The Premises Licence Holder will arrange regular residents' meetings (which may take place online) to discuss the operation of the Premises. For the remainder of 2026, residents' meetings shall be held once per calendar month beginning in July 2026. From 2027 onwards, the frequency of residents' meetings shall be at least once per quarter as follows:
 - a. January to March
 - b. April to June
 - c. July to September
 - d. October to December
11. The Premises Licence Holder shall advertise the date and time of the residents' meetings by:
 - a. Affixing an A4 notice at the main entrance to the Premises from the public highway
 - b. Providing a copy of that notice to the Licensing Authority by email
 - c. Providing a copy of that notice to any person who has provided the Premises Licence Holder with their email address for that purpose
12. The date and time of the residents' meetings shall be advertised at least 7 days before the meetings are due to take place.

13. The Premises Licence Holder shall produce a note (which may be AI generated) of each residents' meeting and a copy of that note shall be served on:

- a. The Licensing Authority by email
- b. Any person who has provided the Premises Licence Holder with their email address for that purpose

within 10 working days of the residents' meeting having taken place.

Copies of these notes (which may be electronic) shall be kept at the Premises and made available on request to Responsible Authority Officers.

SUGGESTED