

**ATTACHMENT A - Procedural context.**

licensing

To: me, Cc: Blackburn, · Thu, 13 Nov 2025 at 11:14

**Message Body**

Dear Mr Boran

Thank you for your email.

We are working with the venue to get the Variation application submitted.

As soon as I receive the application, I will invite you to the Office to view the application.

Kind Regards  
Rekha

**Rekha Masih**

**Rekha Masih**  
Licensing Team Leader

Law & Governance  
Regulatory Services  
Coventry City Council  
PO Box 7097  
Coventry  
CV6 9SL



licensing

To: me, Cc: Blackburn,, and 2 others · Mon, 1 Dec 2025 at 09:40

**Message Body**

Dear Mr Boran

I can confirm that HMV Empire have now submitted a Minor Variation application on Friday. The last objection date is **12<sup>th</sup> December 2025**.

Please let me know a date & time that will be convenient for you to view the plan. I am unavailable today; However, I am available on the following days/times:  
Wednesday 3<sup>rd</sup> December 2025 between 10:00 -14:00  
Friday 5<sup>th</sup> December 2025 between 10:00 – 14:00

Kind Regards  
Rekha

**Rekha Masih**

**Rekha Masih**  
Licensing Team Leader

Law & Governance  
Regulatory Services  
Coventry City Council  
PO Box 7097  
Coventry  
CV6 9SL



Rekha Masih

To: me, Cc: Blackburn,, and 7 others · Thu, 4 Dec 2025 at 12:03

**Message Body**

Dear Mr Boran

I am unable to email the plan of the premises to you because the premises plan does not form part of the public register and, therefore, is not considered a public document.

This position is supported by [The Licensing Act 2003 \(Licensing authority's register\) \(other information\) Regulations 2005](#) see 2(1)(2)(a) & (d), specifically sections 2(1)(2)(a) and (d) – premises plans not being part of the public register.

However, I am happy for you to view the application and plan at the Council Office when it is convenient for you.

An applicant can make a minor variation application to alter the structure & layout of the premises. However, after considering the application and the revised plan, we

have decided to reject this application and advise that a full variation application will need to be submitted.

I can confirm that Minor Variations applications do involve a public consultation.

Finally, I have received an email from Oliver Barnsley on your behalf to view the application and plan. I will be meeting with him on Friday 5<sup>th</sup> December at 1:00pm.

I will advise you when the new application has been submitted and this will be subject to a full public consultation over a 28 day period.

Kind Regards  
Rekha

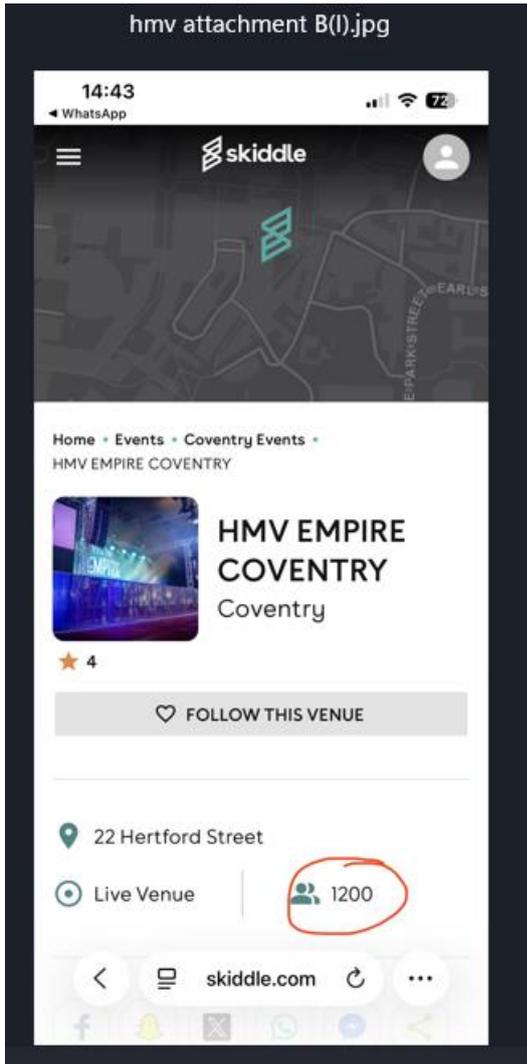
**Rekha Masih**

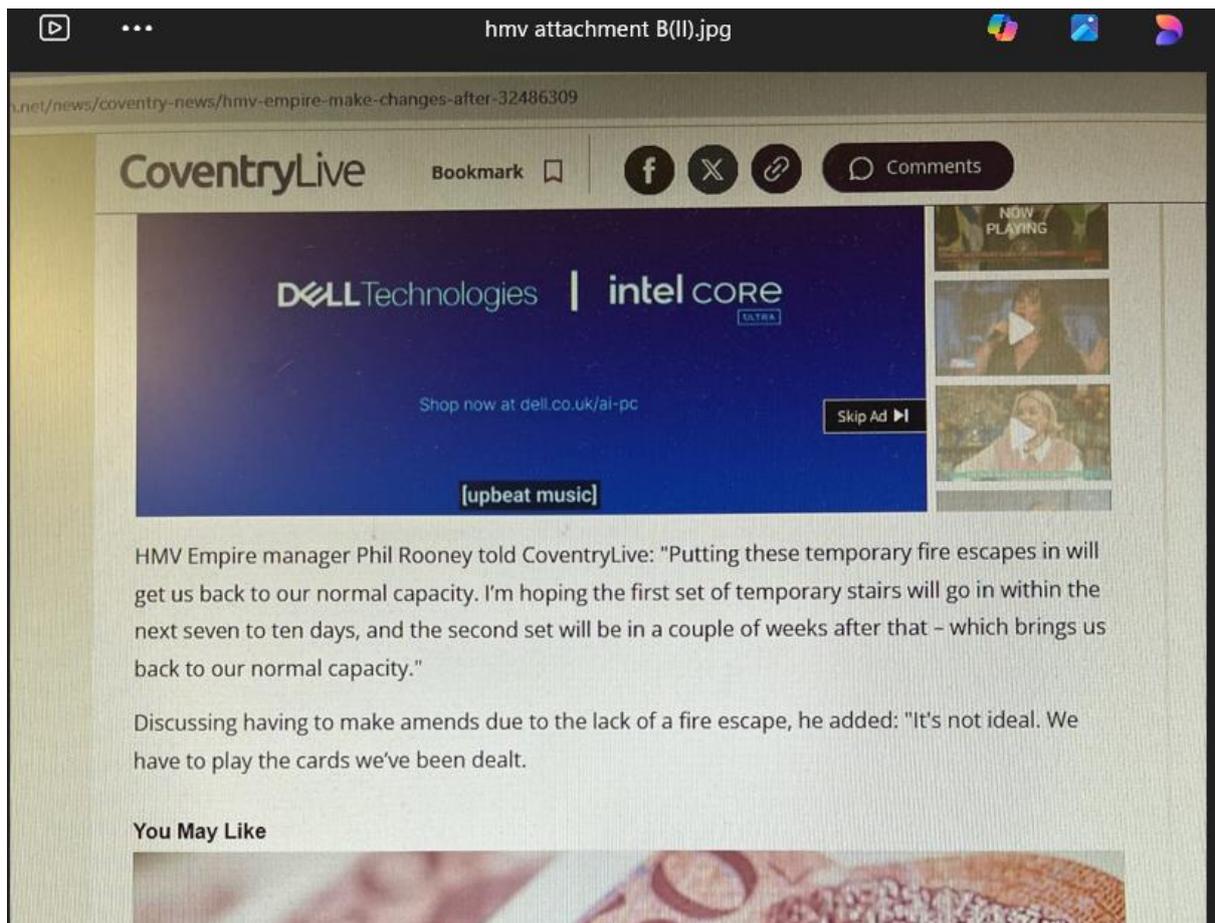
**Rekha Masih**  
Licensing Team Leader

Law & Governance  
Regulatory Services  
Coventry City Council  
PO Box 7097  
Coventry  
CV6 9SL



hmv attachment B(l).jpg





### **Attachment C – Occupancy Evidence Summary**

On 14 November 2025 and 15 November 2025, contemporaneous counts were undertaken of all patrons entering HMV Empire during sold-out live music events.

The counts were conducted using continuous video recording positioned at the sole public entrance to the venue, and involved counting every individual entering the premises.

The results recorded:

- 14 November 2025: 1,087 patrons
- 15 November 2025: 1,123 patrons

These figures relate to patrons only and exclude staff, performers, crew and contractors.

The underlying video footage is available to the Licensing Authority and Responsible Authorities upon request.

Ian Jones

To: me, Cc: Gemma · Mon, 6 Oct 2025 at 15:45

## Message Body

OFFICIAL

Hello Mr Boran

I fully understand your concerns as a parent myself and rest assured the safety of everyone using the premises is also our utmost priority, as the regulator for the Fire Safety Order we will ensure that the premises is safe.

With regards to your 4 areas, I can confirm the following, but I am not able to give formal details as this is between ourselves and the venue management.

For the occupancy figures I can state that the venues will not and has never had an occupancy for over 1300, using the available exits the figure is considerably lower and well under 1000 people.

With regards to the level of fire resistance within the building, there is a protected corridor in place to one side, however adding or changing this will not increase the numbers allowed and the agreed figures will be based on available exit routes, for travel distance the site is within the acceptable distance and is classed as having 2 exit routes. We will also undertake a site visit to ensure what is built is suitable and exit widths and routes allow for a safe follow of people.

Again I am limited in what I can confirm and I don't want you to feel like I am trying to brush you off as this is not the case, but as I am sure you will accept as a regulator I am not in a passion to give out information regarding an ongoing inspection or process, however, the structure will be subject to very regular inspection and certification by a competent contractor, it will also have management inspections and a risk assessment before any event.

We have reviewed all the information supplied by the venue and have undertaken site visits, this has been reviewed by a number of staff within the department including one of our fire engineers, we would not be looking for a third party to review this information as ultimately the final decision would sit with us and as such we would work on our own figures, again we are also not in a position to share the venue information with a third party.

I hope this offers you assurance that the venue will be working with a suitable and safe occupancy number which is more in line with the figures you have referenced,

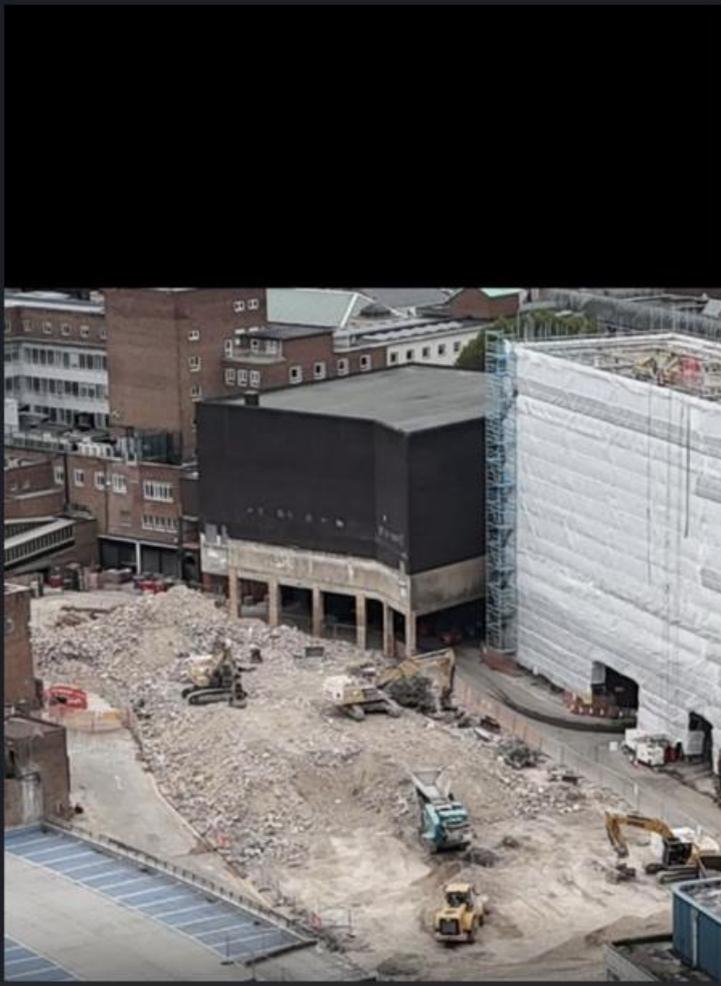
and that we take our responsibility very seriously to ensure the safety of the public and will use as needed and all powers available to us.

Regards  
Ian

**Ian Jones**  
**Station Commander**  
**Fire Safety**  
**0121 380 7500**  
**07973 810 344**  
[ian.jones1@wmfs.net](mailto:ian.jones1@wmfs.net)

OFFICIAL

HMV ATTACHMENT F (i).jpg

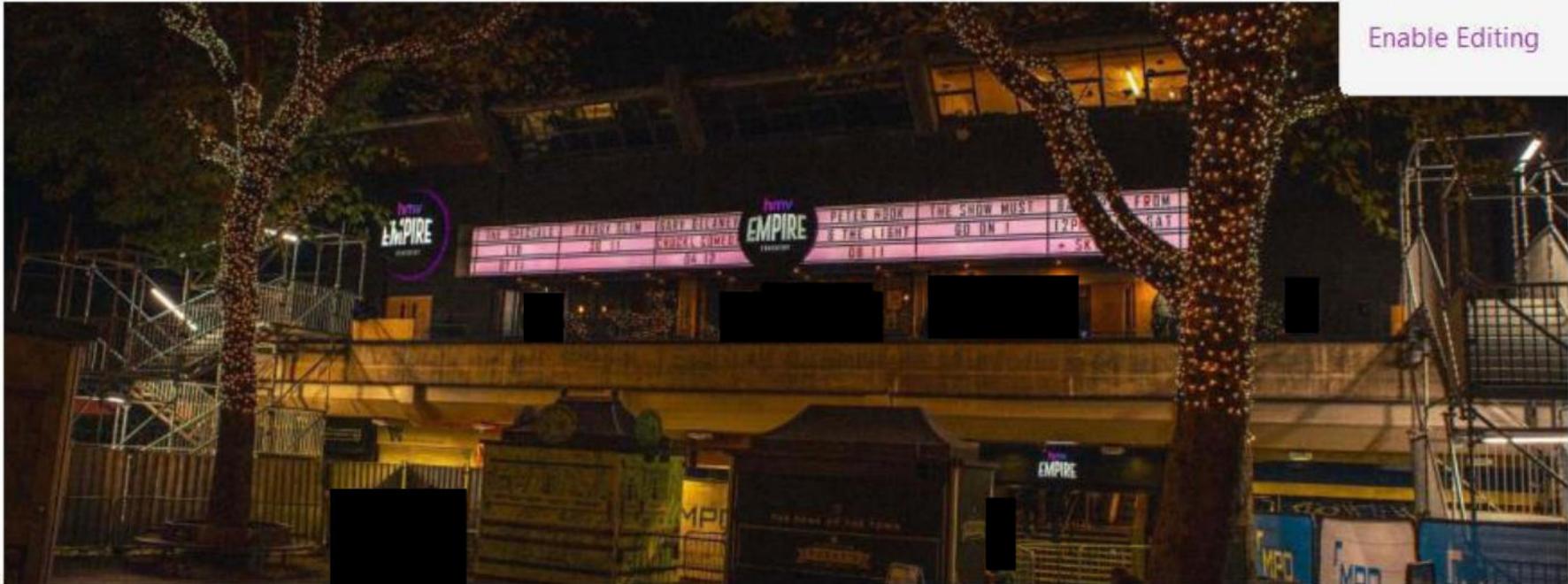




Clear

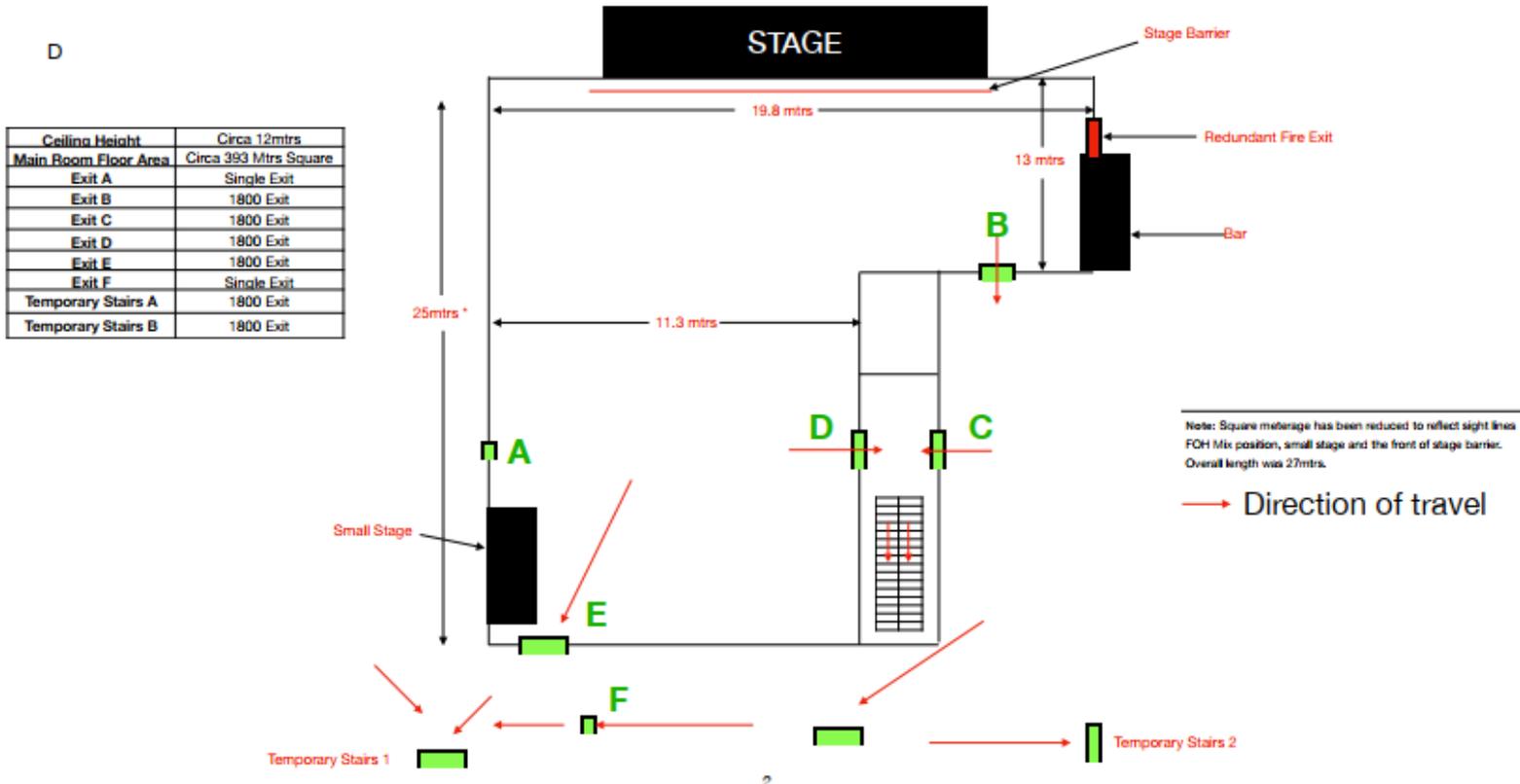
Document Restricti  
and cannot be edit

Enable Editing



**HMV Empire Coventry Observations - Thursday, 20th November, 2025**

# Main Room Floorplan - Not to Scale



# Introduction

I have been appointed by Mr Aran Boran to conduct an informal observation of the Fire Safety arrangements at the HMV Empire, Coventry, during a live event, due to their ongoing public safety concerns relating to occupant capacity and Means of Escape (MOE) from the premises. This observation was conducted on Thursday 20th November, 2025. Venue Management and WMFG were not made aware of this visit by myself. I took photographic evidence and measurements using a Bosch handheld professional laser.

I have reviewed the following documents and email correspondence:

- HAKI Rev A First Issue - 5m Public Access Stair - Project 3009, Sept 2025
- Coventry City Council Decision Notice - PL/2025/0001778/NMA
- Cover Letter for NMA - Ref 942/NMA - 10 Sept, 2025
- Email Correspondence between Mr Boran and Ian Jones (Station Commander) WMFG, who states that site visits have been conducted the final decision would rest with WMFG, who will work on their own figures.

I have advised Mr Boran that the WMFG are the Enforcing Authority under the RRFSGO (2005) and to raise any and all concerns directly with them.

I have not had oversight of the following:

- Venue Fire Strategy
- Revised Fire Risk Assessment
- Revised Occupancy Calculations
- Automatic Fire Detection systems and Maintenance
- Fire Alarm System and Maintenance
- Emergency Lighting (I did observe that the venue had Emergency lighting during my visit)
- Fire Door Maintenance
- Venue Fire Fighting Equipment
- Venue Emergency Procedures
- Venue Showstop Procedure
- Staff Training
- Pre-Doors Safety Checks
- Personal Emergency Evacuation Plan (PEEP)
- Venue Occupant capacity ( I was informed that the capacity was 1000 during my visit. Security staff told me this)

# Security and Fire Marshal's

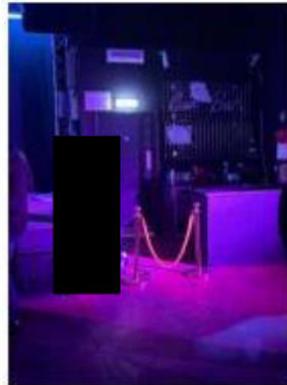
- On arrival I was not searched and did not see anyone else searched.
- Security seemed to be scarce, from my observations, and those that I did see were dressed in black tabards with Hi-viz stripes.
- I did not observe any security positioned by exits internally or externally, other than **Exit A** throughout the entire duration that I was in the venue.
- The final exits would have benefitted from having security positioned on them, to reduce the risk of obstructions by discarded bags and homeless individuals as the venue means of escape are reliant on the temporary staircases being functional.
- The lobby at the top of the escalators, would have benefitted from having security in situ, to reduce congestion and provide direction in the event of any emergency.
- The redundant fire exit, serving the rear of the mailroom, would have benefited from having a member of security located there instead of a sign. Those that are familiar with the venue may navigate towards this exit in an emergency otherwise.
- I did see one fire marshal during my visit, in a red tabard, but am unaware what their role was.

# Signage

- The Final exit doors, served by the temporary staircases **1 & 2** would have benefitted from **FIRE EXIT KEEP CLEAR** signage but this was not present.
- If **EXIT A** - was redundant, the illuminated sign should not have been in use and should have been covered. It was not clear to me if this exit was part of the escape route or not.
- **Staircase B** - had a sign for an emergency evacuation chair but there was no evacuation chair present.



**Staircase 2 Lobby**



**Exit A**



**Staircase 1 Final Exit**



**Staircase 2 Final Exit**

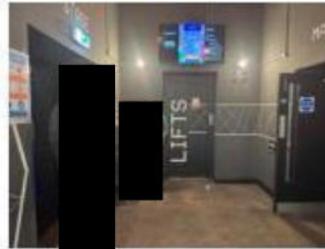
# Means of Escape (MOE)



Exit A: Unclear if this Exit is in use but was illuminated



Exit B



Entrance Lobby: at the top of the escalators, with merging flows from Exits C and D



Exit D: Internal image



Exit E: Internal image



Exit F: Internal image



Exit leading to Balcony from balcony bar



Escalators - from upper level lobby served by Exits C and D

# Means of Escape Considerations

- **Exit A** - It was unclear to me if this exit was in use even though the sign was illuminated
- **Exit B** - Led through to the main bar towards Final Exits.
- **Exit C** - Fed from the Main bar area to the lobby at the top of the escalators. This lobby would have to cope with merging flows via **Exit D** and a reduced flow rate of the escalators which could only cope with a flow of single persons on each tread. The effective width of each escalator was measured as: **718mm** The combined effective width, of both escalators was **1436mm**.
- **Exit D** - Fed from the main room and would be reduced with merging flows from **Exit C** restricting flow rate. The combined effect of the 2 x 1800mm doors, feeding into escalators with an overall effective width of **1436mm** could create a bottleneck and further restriction of flow rate.
- **Exit E** - an **1800mm** double door which was restricted by the proximity of a raised smaller stage thereby reducing the effective width of these doors.
- **Exit F** - a single door exit located in the area adjacent to the balcony. This was obstructed by loose chairs and could impact flow rate in the event of an emergency.
- **Temporary Stair 1** - was served by a circa **1800mm** double door, with push bar. The internal width of the stairs was measured as **1612mm**. This route would have to contend with merging flows from **Exit E**, **Exit F** relevant persons descending from the toilets.
- **Temporary Stair 2** - was served by a circa **1800mm** double door, with push bar. The temporary staircase protruded into the lobby area reducing the available space to **1360mm** which would create a bottleneck and restrict flow through this area. Furthermore, the stairs created a 90 degree right turn which would further restrict flow.
- The largest exit was **Temporary Staircase 1**, which should be discounted from the overall exit capacity.
- Of note, other than **Exit A**, I did not observe any security staff positioned by exits (with exception of **Exit A**) or Final Exits of the temporary staircases, throughout the observational site visit.

# Means of Escape Imagery



**Exit F** from balcony bar obstructed by loose chairs



**Exit E** from main room obstructed by small raised stage, reducing effective width and flow



**Escalator** width from main entrance serving **Exits C & D**



**Staircase A** - showing merging flows from **Exit F** and **toilets**. **Exit E** also feeds into this space



**Unprotected cable** on egress route from main entrance which is a trip hazard that could cause a crowd collapse



**Staircase B** from balcony has a circa 1800mm double door which the protruding staircase can be seen through the door glazing. This protrusion reduces the width from circa 1800mm to 1360mm and has a 90 degree right turn to contend with contributing to potential bottlenecks and restricted flow



**Staircase A** - On arriving at the venue, I looked at the Final exits from Staircase A and B. Staircase A had a discarded rubbish bag which would restrict the door opening width, restricting flow rate through this final exit.

# Occupancy

- In a licensed premises, occupants will understandably consume alcohol which will reduce perception of risk, delays reaction times and underestimates danger.
- Conversations I had with a member of security informed me that the event had sold out and the capacity was **1000 persons**. I could not clarify if this was tickets sold, or tickets sold, guests and staff/touring crew.
- I observed a mobility impaired individual, with 2 x carers, in a mobility chair within the main room.
- Undesirable occurrences can happen even with the most robust policies, procedures in place which is why the Showstop Procedure plays such an instrumental element to incident management in an emergency for live events. The Showstop procedure serves to reduce pre-movement time, in sports and entertainment venues, particularly with amplified sound, as the alarm would not be heard over the PA.
- The venue alarm may well have had an automatic cut off to the sound with house lights automatically being turned on. I am unaware if this is the case.
- The main room was full from front to the rear. Crowd density was circa 3-4 people/metre square with more space near the rear. I find it hard to fathom how an additional 350 persons would fit comfortably in that space if the original capacity was 1350.
- The demographics ranged from younger individuals to mature adults with male/female split circa 65/35% but a calm atmosphere and no aggression whatsoever



# Conclusion

As previously communicated, the WMFS has the final decision on occupancy and have full oversight of all relevant information pertaining to the venue and its fire safety arrangements. My assessment was based on observations from a site visit during a live event, with a fully sold out event and does not override the assessment of WMFS or the decision made by the local authority.

## Means of Escape

Identifying the largest exit as **Staircase 1**, this left an overall remaining width of **2976mm** (that I am aware of, not including any exit width from **Exit A**). This allows a range of between **545 persons** and **559 persons**. What this does not factor in is the bottlenecks at **Staircase 2**, caused by the reduced lobby which is served by a circa 1800mm double door, the 90 degree immediate right turn onto the stairs, or the merging flows at the top of the escalators served by **Exits C and D**. All of these will reduce flow rate which will also be impacted by alcohol intake and crowd density levels within the main room.

**The reduced exit capacity at Exit E and Staircase 2** would restrict flow through these exits and I cannot see how a **2.5 minute** evacuation time would be achievable. It may be the case that WMFS has increased this time based on multiple other factors which I am unaware of. This should be taken up directly with WMFS.

**Staircase 1** has to cope with merging flows from the upper level toilet, the main room, Via **Exit E** and those exiting via **Exit F**

The loose chair positioned by **Exit F** could obstruct MOE from this location and should be removed to keep this space clear at all times.

The venue need to cater for those that are mobility impaired. A sign for an evacuation chair, without an evacuation chair is concerning. Based on space restrictions, it may be better to locate an Evac chair by **Staircase 1**.

I did not see security staff positioned on exits within the premises, other than **Exit A** particularly as the venue layout is complex, with a reliance on temporary staircases and refurbishment works to facility the Means of Escape, even for a sober person as I was. If you were unfamiliar with the venue, there would be a lot of reliance on announcements on a PA, or from the stage, and directions from security who when dressed in black tabards were not as visible as they could have been.

Regular checks of final exits should be conducted by security to ensure there are no obstructions that would impede any evacuation through these final exits. These inspections should be logged as should a pre event safety check.

The trailing cable by the front entrance should have been picked up in any pre event safety check. This was a concern for me on ingress but to see it there, exactly as we had seen it earlier, was of particular concern.

Your concerns are valid based on what I have seen however, I must remind you that I hold no authority to make any decision, nor have I had oversight on the documents and other related information, that WMFS would have been privy to, as set out in this document. This document is based only on my observations on 20th November, 2025.