



## BLANDY & BLANDY

solicitors

The Licensing Authority  
London Borough of Enfield  
By Email Only

Blandly & Blandly LLP  
One Friar Street  
Reading  
Berkshire  
RG1 1DA  
0118 951 6800  
DX 4008 Reading  
www.blandly.co.uk

DD: 0118 951 6822  
DF: 0870 197 5383  
E: Sue.Dowling@blandly.co.uk

**Our Ref:** SED/TOT9/10  
**Your Ref:** Licensing  
Authority/Ellie Green  
**Date:** 12 April 2019

Dear Sirs

### Relevant Representations against new Premises Licence applications:

- WK/218074640:** Units 4-6B Orbital Business Park, 5 Argon Road, London N18 3BW –  
Capacity Limit: 9,999
- WK/218074598:** Units 4-6B Orbital Business Park, 5 Argon Road, London N18 3BW –  
Capacity Limit: 39,999
- WK/218074578:** Meridian Water Land to South of Units 4 to 6B, Orbital Busin,  
5 Argon Road, N18 3BW.  
Capacity Limit: 39,999

**Our Client/Objector:** Tottenham Hotspur Limited and Tottenham Hotspur Football &  
Athletic Co Ltd, both of Lilywhite House, 782 High Road, London N17 0BX

We have been instructed by the above-named clients to lodge representations against the above three applications made by the Applicant (Broadwick Venues Limited) seeking Premises Licence(s) in relation to proposed licensed "Premises" as identified in the above heading.

### **Introduction**

Unless otherwise stipulated in this letter, kindly note that:

1. The contents of this Representation applies in terms of relevance to and/or in objection to, each of the (three) Applications;
2. This Representation is in addition to and should be read in conjunction with the Representation lodged on 23 January 2019 ("the Original Representation") which relates to the same proposed licensed "Premises".

Blandly & Blandly LLP is a limited liability partnership registered in England and Wales under number OC 348096. The registered office is at One Friar Street Reading, RG1 1DA. A list of Members may be inspected at our Registered Office. "Partner" denotes a Member or a senior Employee of Blandly & Blandly LLP.

Blandly & Blandly LLP is authorised and regulated by the Solicitors Regulation Authority and authorised by the Financial Conduct Authority.

Lexcel Accredited



# BLANDY & BLANDY

solicitors

## ***General Observations/Objections to the Applications***

Before setting out in detail the nature of our clients' objections to the applications, our clients wished to put on record their dismay at what they perceive is a total lack of serious engagement that the Applicants have displayed to date, not only with the statutory licensing process but also with regards to proper engagement with their organisation, and others in the locality, whose input should clearly matter to the Applicant.

Bearing in mind that our clients' fully licensed and GSC certificated Stadium is 'a stone's throw' away from the Applicants' proposed "Premises", our clients expected the Applicants to be in a position to share properly articulated plans (for example relating to transport management; crowd control; stewarding; security etc...) to demonstrate how they propose operating a large scale event, in a locality where the infrastructure will already be saturated by existing licensed events.

Disappointingly the Applicants have not been forthcoming with any specifics as to how they will ensure that their proposed licensable activities will not (as a result of cumulative impact, or otherwise) negatively impact on the promotion of all four licensing objectives.

In sharp contrast, the Applicants appear to be acting in a manner which assumes that the issue of a Premises Licence for large scale festival events (in an open space with no infrastructure supporting such events) is a foregone conclusion. This is evident from their (and/or their partners) website relating to the Field Day festival event in June 2019 (see printed information at **Appendix 1**). Although this large-scale event (which clearly will involve considerable licensable activities and large crowds) has been heavily promoted and is bound to have a significant impact on the promotion of the Licensing Objectives, as far as our clients are aware, no specifics have been made available concerning any proposed SAG meeting.

## ***Grounds for our Clients' Representation:***

The grounds of our clients' Representation are essentially fivefold (although the grounds overlap and include numerous individual elements):

1. The Applicants' failure to comply with the statutory procedural requirements of the Licensing Act 2003 and supporting Regulations, resulting in the Licensing Authority not having authority to consider the applications (through delegated powers or at Committee); and/or
2. The Applicant's failure to particularise in any meaningful way its Operating Schedule for the proposed "Premises", resulting in the applications being devoid of any specifics on which the Licensing Authority, other Responsible Authorities and local interested parties (businesses and local residents) can reasonably be expected to respond; and/or
3. The Applications are an attempt to usurp the position of the Responsible Authorities (and the Licensing Committee) by seeking to transfer their obligations and powers to



## BLANDY & BLANDY

solicitors

a (yet to be defined) Safety Advisory Group;

4. The Applications are an attempt to transfer the management and operational responsibilities for the promotion of the licensing objectives at the proposed "Premises" to the SAG, which is fundamentally wrong; in breach of the "Purple Guide" recommendations and other Event Industry recommendations;
5. Without limiting the above, the applications are fundamentally flawed as they fail to articulate with any precision how the four licensing objectives will realistically be met at the proposed "Premises" when existing licensed Premises (including large venues such as Tottenham Hotspur Stadium; Alexandra Palace and/or the London Stadium are operating events within the remit of existing licensing authorisations.

To expand on the five Grounds set out above, we have prepared the attached table (at **Appendix 2**) to provide specifics to assist the Licensing Authority, other Responsible Authorities, and the Applicant to understand the full rationale behind our clients' objections to the proposed applications; why we consider that the Licensing Authority should not have accepted the applications and/or why the applications should be refused in their entirety.

### **Conclusions:**

In view of the detailed Representation above (and set out in Appendix 2) and the very serious concerns that these Premises Licence applications have raised (relating to the promotion of the licensing objectives), the Applicant may consider it best to withdraw their applications.

Kindly confirm safe receipt of this letter of Representation (with three appendices) on behalf of Tottenham Hotspur Limited (of Lilywhite House, 782 High Road, London N17 0BX) and on behalf of Tottenham Hotspur Football & Athletic Co Ltd (of the same address). Please note that any correspondence or information relating to this matter should be sent to the writer or emailed to her at [Sue.dowling@blandy.co.uk](mailto:Sue.dowling@blandy.co.uk)

Yours faithfully

**Blandy & Blandy LLP**

- Appendix 1: Information about Field Day Event in June 2019 at the proposed Premises;  
Appendix 2: Table setting out specifics of the Grounds for the Representation.  
Appendix 3: Purple Guide information and other relevant materials