

Annex 20a

Dear Madam

**Meridian Water Applications (recently renamed “Drumsheds” and “Festival”
Licence applications)
Hearing: 8 May 2019**

**Further information relating to THFC’s Representations, for inclusion in
Agenda Papers:**

Further to our clients’ considerable Representations against the issue of the applications sought by the Applicant (relating to land owned by Enfield Council) relating to the meanwhile use of the Units and Land at Meridian Water (pre-development), we now provide some further information in support of those Representations for inclusion in the Agenda papers.

Please note that as at today’s date, we have received no further specifics from the Applicants relating to their licensing applications (including no further information relating to the brief Operating Schedules contained in their LIC 2 application forms), although we note that the Applicants continue to advertise their “Field Day 2019” Event as though its Premises Licence has already been granted (see copy photographs taken in Enfield High St this last weekend). This “ploughing on regardless” attitude of the Applicants continues to demonstrate (in our view) that they have little or no regard for the serious concerns of the objectors or indeed for the role of the Licensing Committee members (in carrying out its duty under section 4(1) of the 2003 Act).

Accordingly our clients maintain their full objections to the issue of the new Licences, as they have genuine concerns that all four licensing objectives will be seriously compromised if the Applicants are permitted to conduct licensable activities at the proposed venue when Events (which are already licensed) will already be taking place at the Stadium.

THFC Stadium Events:

In relation to Tottenham Hotspur Stadium Events – in very broad terms – during every calendar year – the Stadium will be used for the following “Major Events” i.e. events in the Stadium bowl which will involve between 10,000 and 62,000 spectators:

1. **In the 10 months of the football season (so mid-July to mid-May):**
 - a. Pre-season matches/international tournaments at home during July and August;
 - b. Premier League home matches will be held mid-August to early May
 - c. FA Cup home matches;
 - d. Carabao Cup home matches;
 - e. UEFA Champions League and/or Europa League home matches.

How many home matches are held during a season of course depends on how well the team is playing/how far in the particular competition it succeeds and/or the fixtures list, but typically, looking at the team's performance over the last 3 years, an estimate of 30 matches per season at home is entirely realistic (see attached fixtures list for 2017/2018 by way of example).

It is of fundamental importance to appreciate that THFC is obligated to honour its contractual obligations with the Premier League/Sky/BT etc... and thus its obligations are "set in stone" during the football season.

2. **Additional sporting events** – so for example for 2019/20 (and for a number of future years) - various rugby fixtures will be played at the Stadium (involving Saracens and other clubs). Rugby events will take place (in all likelihood) in the international breaks of the club football season (e.g. November and/or March of each year) or during the football off-season (e.g. May/June).
3. **For NFL Games** – the Club is contracted to host a minimum of two games for the next ten years with the first two games recently announced for 6 and 13 October; it is possible that up to 8 NFL games per season will be played in future years. This agreement will last for a minimum of a further 9 years.
4. **Other non-football association major Events** – a total of 16 is permitted per annum (inclusive of 6 music concert events).
5. **Music Concert Events** – The Stadium is licensed (and has planning permission) to hold up to 6 music concerts in the "Bowl" per annum. These concerts will (in all likelihood) take place in the period from late May (from around 20th onwards) up to (and possibly including) the first weekend in July, each year. Although the aim is usually for concerts to be held at the weekend, they may be held during the week – much depends on the availability of the particular performer.

Further, as the Stadium offers one of the most advanced facilities of its kind in the World, it comprises part of the UK's nationally-important sports infrastructure and will consequently be a candidate host stadium for a whole variety of international sporting events in future years some for which it has already bid for, and could include UEFA Club Competition Finals, European Club Rugby Finals, International Rugby World Cup Finals, Global eSports Finals as well as the major events such as the Summer Olympics, FIFA World Cup and UEFA European Championships etc...

2019/2020 and Beyond:

Thus looking at the attached calendar (for 2019/2020) (providing the broad "picture" only) – it is clearly obvious that the Stadium (through its existing authorisations including under its existing Premises Licence (granted in 2018)) will be operational to a high degree in terms of Events – leaving only a very small "window" – probably in mid-July each year (when the pitch is being renovated) – when it is possible (but not certain) that a Major Event in the Stadium Bowl will not be happening. When printing the attached calendar, please ensure that it is printed in colour so that it makes sense.

Summer Events at the Stadium in 2020:

By way of additional information, our clients have confirmed that **for each weekend between Saturday 23 May 2020 and 27 June 2020**, music concerts (or other non-football Events) are already booked (in the sense that commercial agreements have been made) and in all likelihood, the HOTs and final contracts for those Events will be finalised imminently. Indeed for the weekend of 6th and 13 June 2020, in the unlikely event that the commercial agreement with the “first pencil” Event is not finalised, THFC already has two music concerts in reserve. It is therefore beyond doubt that if the Applicants were permitted to conduct licensable activities at the proposed venue on the same day that the concerts at the Stadium were taking place, the transport infrastructure would not be able to accommodate the Meridian Water crowd on top of the existing Stadium’s audience of c 55,000.

Park Lane Square:

Further, the Committee should be reminded that the 62,000 capacity Stadium is not the only licensed venue within the newly developed Tottenham Hotspur/Northumberland Park Regeneration. Park Lane Square – a large area of open space in front of the south side of the Stadium – is already fully licensed (under the Licensing Act 2003) authorising “Major” Events (and other licensed occasions) under Premises Licence LN/000020260 (issued in June 2018), permitting large capacity audiences.

Additional information:

We also consider the attached letter from THFC (Richard Serra, Head of Planning) in relation to the recent application for planning consent for the use of the Units/Land of 18 April 2019, to be of relevance to the Applicant’s applications and our clients’ Representations.

This letter contains relevant information in opposition to the licensing applications (under the LA 2003) and we consider provides a very useful and clear analysis of the issues relevant to the Licensing Objectives in the context of the Applicant’s applications (both under the Planning regime but also under the Licensing regime under the 2003 Act).

We would be grateful therefore if this email and the attachments can be included in the Agenda Papers, along with our client’s detailed Representation of 12 April 2019 with Appendices, (and its earlier representation of 23 January 2019) ready for the Hearing on 8 May.

Representation at the Hearing next week:

We confirm that our clients have instructed Gerald Gourier QC to represent them at the Hearing on 8 May; it is still anticipated that Mr Serra and Mr Thorpe will be present to answer questions and/or to elaborate on any details contained in THFC’s Representations (including on the information provided in this email and the attachments to it).

Kindly confirm safe receipt of the above and the three attachments.

Yours sincerely

Sue Dowling

Partner

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For and on behalf of Blandly & Blandly LLP

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Please Note: Since drafting this email, we have received an email (with attachments) from the Applicants' solicitors this afternoon; the above may therefore be subject to change once we have had the opportunity to consider the information provided.