

DRUMSHEDS EVENTS APPLICATION

MERIDIAN WATER 4-6B ORBITAL BUSINESS PARK 5 ARGON ROAD EDMONTON LONDON N18 3BW

LONDON BOROUGH OF ENFIELD LICENSING SUB-COMMITTEE

HEARING 9 JULY 2019

Bundle by Tottenham Hotspur Football & Athletic Co Ltd (THFC)

In support of its Representation against the Drumsheds Events Premises Licence application

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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".

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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



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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

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

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Appendix 2

Requirement/Basis of Representation [See Letter of 12 th April 2019]	Authority	Compliance by Applicant 4640/4578&98	Representation for application 4640, and for 4578 & 98 (unless stated otherwise) (a)	Relevance to Licensing Objectives (CD)(PN)(HC)(PS) and (ALL) ¹	Other observations by THFC
1. Procedural Requirements Application is subject to compliance with Regulations	(17) ² (17(2))				
Form of Application Prescribed form used ✓	(54) Reg. ³ 10	✓			
Compliance with Regulations required by applicant and by Licensing Authority	Reg. 4 Reg. 6	X X	For the Reasons explained below, the Application submitted by the Applicant was defective and should not proceed to a Hearing. The ability for the application to be heard at a Committee Hearing is dependent on the requirements in Regulation 17 having first been met.	<p>ALL</p> <p>The Licensing Act (and Regulations) set out the statutory framework with which compliance must be achieved. This is to ensure that the Responsible Authorities and Interested Parties (and the Licensing Committee) have sufficient information to adequately consider the application before them.</p> <p>Without the application being made in the correct form with the correct supporting documents, there can be no guarantee that any of the Licensing Objectives will be met.</p> <p>The applications are seeking late licences (operating 22 hours daily) for large capacity crowd (10,000 to 40,000). One would expect full information have been provided to the Responsible Authorities and interested parties in advance of any formal application for permanent licences being made.</p> <p>THFC⁴ has no confidence that on the scant information provided by the Applicant in both applications, the Licensing Objectives will be promoted. Without limiting the aforesaid, the Applicants have completely failed to explain how their proposed "premises" will operate safely when a (bow) Event is taking place at Tottenham Hotspur Stadium; at Alexandra Palace; at the London Stadium and/or at other event venues in the locality</p>	
Operating Schedule must accompany application		X	X The Operating Schedule lacks sufficient clarity – see Section 2 of this Representation	<p>ALL</p> <p>Due to the paucity of information provided as to how this large capacity "venue" will operate there are concerns that none of the Licensing Objectives will be promoted</p>	See comments to the left and Section 2 of Representation

¹ CD = Prevention of crime and disorder; PN= Prevention of Public Nuisance; HC = prevention of harm to children; PS – promotion of Public Safety. All – means that the matter (and Representation) is relevant to all four Licensing Objectives

² All references in brackets are to the relevant section in the Licensing Act 2003

³ References to Regulations are to the Licensing Act 2003 (Premises Licences and Club Premises Certificates) Regulations 2005.

⁴ Tottenham Hotspur Limited and Tottenham Hotspur Football & Athletic Co Ltd

Appendix 2

<p>Plan in Prescribed Form</p>	<p>(17)(3)(b))</p>	<p>The Applicant has failed to comply with Regulation 23(3) including 23(3)(a) to 23(d)</p>	<p>X The Plan lodged for each application lacks the information required by Regulation 23 and is illegible. It provides no details as to which proposed licensable activities are to be conducted where in the proposed Premises. It therefore also fails to comply with Regulation 23(3)(d)</p>	<p>ALL As the plan for each application is illegible, it is impossible to see from this how the proposed "Premises" could safely be assessed to be used for, or actually used for, any licensable activities let alone those involving large-scale capacity crowds of between 10,000 and 40,000. The Responsible Authorities on receipt of the plans will not be able to adequately assess whether the proposed "Premises" can be operated safely (not least as they will not be able to take measurements from the plan). For an application of this nature, involving large scale audiences, not only should clear plans have been lodged of the proposed Premises - but also proposed layout plans (showing probable stage positions, crowd-flow modelling; medical/first aid points etc).</p>	<p>For an application of this nature, involving planned large scale audiences, not only should clear plans have been lodged of the proposed "Premises" - but also proposed layout plans (showing probable stage positions; crowd-flow modelling; medical/first aid points etc.) for likely Events in the licensed space. One would expect the various layout plans to be provided in advance of, or certainly with the LIC 2's application so that they form part of the application and the Operating Schedule therein. Such detailed plans (showing what licensable activities are likely to take place where) are of crucial importance particularly where the proposed Site has no infrastructure in place to meet any of the usual requirements - to allow for the safe access/egress of crowds (including disabled guests); security measures; first aid and toilet provisions etc.... No consideration appears to have been given in advance of making the application to the Event Safety Guide (the Purple Guide).</p>
<p>Prescribed form of Plan</p>	<p>Reg.23(1)</p>	<p>X</p>	<p>X The Plan is illegible and fails to show the prescribed information at Regulation 23 (3)</p>	<p>ALL - see above</p>	<p>See above</p>
<p>Contents of plan</p>	<p>Reg.23(3)</p>	<p>X</p>	<p>X See above comments</p>	<p>ALL - see above</p>	<p>See above</p>

⁵ Any bold or underling in this representation is for emphasis only.

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Advertising of the Application Newspaper Site Notices	(17(5)) Reg.25(a) Reg.25(b)	✓ X								
			X	The Site Notices do not appear to have been erected in prominent positions. In particular the Site Notices for application(s) 4578898 were poorly displayed (see photograph at Appendix 3). Whilst a Site Notice was erected at the entrance to the wooded area – there was no Site Notice at the exit to that area – although this would have been a logical, obvious place to put one. The effect of Section 17(5)(a)(ii) is that the advertisements must not only be in the prescribed form but they must be advertised “in a manner which is prescribed and is likely to bring the application to the attention of persons who live, or are involved in a business in the relevant licensing authority area and who are likely to be affected by it”.						ALL The manner in which the applications have been advertised is highly confusing. Even if the applications had come to the attention of local residents and businesses, it is highly likely that the residents and businesses may have been hampered in lodging representations due to the fact that the details of applications on the website do not match those advertised in the local paper and (partially) on site.
Information for notices Advertising by Licensing Authority	Reg.26(4) S.17(5) (aa)	X								
			X	The Applications as advertised on the website by the Licensing Authority do not match the applications advertised in the local press or the Site Notices displayed by the Applicants. The Licensing Authority has advertised three applications whereas the Applicant has made two applications						ALL The manner in which the applications have been advertised is highly confusing. Even if the applications had come to the attention of local residents and businesses, it is highly likely that the residents and businesses may have been hampered in lodging representations due to the fact that the details of applications on the website do not match those advertised in the local paper and (partially) on site.
Determination of a Premises Licence application ⁷	(18)									
Application must comply with sections 17 and advertising requirements (of Applicant and LA)	(18(1))	X								
			X	As the Applications have not been made in the correct form (in the sense of insufficient and contradictory information being given in the Operating Schedule; insufficient advertising of the applications and/or inadequate plans being lodged) the Licensing Committee has no jurisdiction to consider the applications at Committee. Section 18 only permits the Licensing Authority to determine any application for a Premises licence where the application was received by it in accordance with Section 17 and where it is satisfied that the Applicant has fulfilled the requirements stipulated by the Regulations.						ALL The manner in which the applications have been advertised is highly confusing. Even if the applications had come to the attention of local residents and businesses, it is highly likely that the residents and businesses may have been hampered in lodging representations due to the fact that the details of applications on the website do not match those advertised in the local paper and (partially) on site.

⁶ Reference should also be made to the Revised Guidance to the Act, paragraphs 8.80 to 8.87

⁷ Reference should also be made to the Revised Guidance to the Act, section 9

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The Licensing Authority's powers at a Hearing	(18(3))	<p>Note: If the Licensing Committee does hear the Applications, it only has the powers available to it as set out in section 18(3) LA 2003. In terms of granting any licence subject to conditions, those conditions must be "appropriate"</p> <p>The conditions proposed by the Applicants are inappropriate for the reasons articulated in this Appendix 2.</p>	<p>ALL</p> <p>The Operating Schedule set out by the Applicants is inadequate and inappropriate for the reasons set out in section 2 of this Appendix below.</p>	<p>The Operating Schedule set out by the Applicants is inadequate and inappropriate for the reasons set out in section 2 of this Appendix below.</p> <p>It is our submission that a Licence cannot lawfully be issued on the basis that there may (or may not) be future agreement of fundamental terms (relating to the four Licensing Objectives) with third parties, which may (or may not) then be treated as "conditions".</p> <p>Such conditions (based on an agreement to the Licensing Committee to agree with other third parties) would fall foul of s.18(4)(a)(i). Such assurances (contingent on reaching agreement with third parties) do not result in enforceable conditions.</p> <p>The Licensing Authority should only grant the Applications if it is entirely satisfied (on the information already forming part of the Operating Schedule) that the Applicant has provided evidence to demonstrate that it can promote all four Licensing Objectives at a large scale event, when the emergency services and Responsible Authorities may be committed to an existing licensed event elsewhere, in close proximity.</p>
Revised Guidance to Licensing Act 2003	Para.1.16	<p>Conditions on Premises Licences must beprecise and enforceable; unambiguous and clear; must be tailored to the individual type location and</p>	<p>ALL</p> <p>The information provided by the Applicant in its applications (section M) is imprecise; unenforceable; and</p>	<p>Whilst the Applicants have set out various steps in section M of their</p>

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		<p>characteristics of the premises and events concernedshould be capable of being met.....</p> <p>The conditions proposed by the Applicants are inappropriate for the reasons articulated in Appendix 2.</p>	<p>provides assurances (for example around the future involvement of SAG members and the future possible agreement of measures) which may or may not be capable of being fulfilled.</p>	<p>applications, in most instances those steps lack precision and/or refer to future discussion/agreements/activities (which may or may not actually happen). For example assurances are put forward that numerous plans (for example relating to Traffic Management; Noise Management; Risk Assessment; Medical Management) will be "devised" or will "define" or "detail" the specifics but this does not provide any guarantee that the plans will a) be prepared to a satisfactory standard; b) taking into account matters relating to the Licensing Objectives; c) take into account the views of interested Parties etc.....</p> <p>For large scale events, THFC are of the view that the Applicants should have prepared the various plans in advance of making their applications and should have circulated them to the Responsible Authorities. The Plans should have been available for inspection to interested Parties at least to the extent that those interested Parties will be impacted by the planned large scale events..</p>
<p>Para 2.7 to 2.9</p>	<p>X</p>	<p>Licence Holders have a responsibility to ensure the safety of those using their premises....a number of matters should be considered in relation to public safety including the 8 items bulleted in para 2.8. Applicants should consider when making their application which steps it is appropriate to take to promote the public safety and demonstrate <u>how</u> they achieve that...</p> <p>The steps suggested by the Applicants are insufficient comprising a standard but incomplete list of common measures without consideration of the locality; other major events and/or how the steps can be codified into enforceable conditions.</p>	<p>X ALL but specifically public safety</p>	<p>See above comments and further comments in Section 2</p>
<p>Para 8.34</p>	<p>X</p>	<p>Plans....must be in a format with is "clear and legible in all material aspects" i.e they must be accessible and provide sufficient detail for the licensing authority to be able to determine the application including the relative size of any features</p>	<p>The plans submitted are illegible and lack any clear information (particularly, but not limited to, lack of detail</p>	

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			relevant to the application. There is no requirement for the plans to be professionally drawn as long as they clearly show all the prescribed information.	around the external walls of the proposed "Premises"; and access/egress from the "Premises" See comments above in relation to failure to comply with Section 17 and Regulation 23 requirements	See comments to the left and further comments in Section 2 of Representation
Para 8.41	X	In completing an Operating Schedule, Applicants are expected to have regard to the statement of licensing policy for their area. They must alsodemonstrate knowledge of their local areas when describing the steps they propose to take to promote the licensing objectives. Applicants are also expected to undertake their own enquiries about the area in which the premises are situated to form the content of the application. The steps suggested by the Applicants are insufficient comprising a standard but incomplete list of common measures without consideration of the locality; other major events and/or how the steps can be codified into enforceable conditions.		X ALL The Operating Schedules fail to take sufficient account of the Statement of Licensing Policy (see below) and fail to take any account of the fact that the Applicant is proposing large scale events in an area of considerable congestion, within a "stone's throw" of large licensed Stadia and other Event spaces.	See comments to the left and further comments in Section 2 of Representation
Para 8.42 to 8.7	X	These paragraphs set out various expectations of the Applicants prior to making of on making any application for a Premises Licence. These include (in summary only): <ul style="list-style-type: none"> • Providing sufficient information to demonstrate (when setting out steps they propose to take) that they understand the layout of the local area and physical environment including crime and disorder hotspots; risks posed to the local area by their proposed licensable activities... • How the Applicants will manage potential risks; • Through making local enquiries – consider all factors which may be relevant to the promotion of the Licensing Objectives • Providing Licensing Authorities with sufficient information (covering their applications) to determine the extent to which their proposed steps are appropriate to promote the licensing objectives in their area. <p>The steps suggested by the Applicants are insufficient comprising a standard but incomplete list of common measures without consideration of the locality; other major events and/or how the steps can be codified into enforceable conditions.</p>	X ALL The applications submitted by the Applicants fail to demonstrate that they have fulfilled any of the expectations set out in these paragraphs of the Guidance. Without limiting the aforesaid, the Operating Schedules fail to take sufficient account of the Statement of Licensing Policy (see below) and fail to take any account of the fact that the Applicant is proposing large scale events in an area of considerable congestion, within a "stone's throw" of large licensed Stadia and licensed event spaces (such as Alexandra Palace)	See comments to the left and further comments in Section 2 of Representation	
Para 8.49	Xall Operating Schedules should be precise and clear about the measures that are proposed to promote each of the Licensing Objectives The steps suggested by the Applicants are insufficient comprising a standard but incomplete list of common measures without consideration of the locality; other major events and/or how the steps can be codified into enforceable conditions.	X ALL The Operating Schedules submitted are not precise and clear, but largely attempt to shift the responsibilities to promote the Licensing Objectives onto other parties (particularly members of a SAG). See further at section 2 of this Representation	See comments to left and further in Section 2 of Representation	
Para 9.39		Any conditions imposed must be appropriate for the promotion of the licensing objectives; there is no power for the licensing authority to attach a condition that	X ALL	THFC are of the view that the steps proposed by the Applicants in section M of their applications are	

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			is merely aspirational.... Any conditions added to the Licence must be those imposed at the Hearing or those agreed when a hearing has not been necessary.... The steps suggested by the Applicants are insufficient comprising a standard but incomplete list of common measures without consideration of the locality; other major events and/or how the steps can be codified into enforceable conditions.	It follows from Section 18 LA 2003 and from this paragraph in the Guidance that licence conditions can only be imposed by the Licensing Committee. A condition for third parties (e.g. SAG members) to agree terms to comprise a condition at some stage in the future is outside the powers of the Licensing Committee.	largely aspirational in the sense that the Applicants are stating that they will obtain the approval of fundamental operational plans from third parties (SAG). Such conditions are inappropriate and unenforceable, rendering any such conditions entirely useless. See Section 2 below
Enfield Council, Statement of Licensing Policy					
	Para 3.3	X	Conditions attached to any Licence will focus on matters within the control of individual licensees and in the vicinity of the proposed Premises. The steps suggested by the Applicants are insufficient comprising a standard but incomplete list of common measures without consideration of the locality; other major events and/or how the steps can be codified into enforceable conditions.	X ALL	X The conditions offered by the Applicants are not matters which are within their control – they are promising matters which the Applicants cannot control for example obtaining approvals from third parties such as SAG members. Such conditions are inappropriate and unenforceable.
	Para. 8.3	X	The Licensing Objectives should be paramount considerations at all times The scarcity of information in the operating schedules fails to demonstrate how in reality the LOS will be treated and enforced as paramount.	X ALL The Applicants' operating schedules contain insufficient information to demonstrate that they will ensure that the promotion of the Licensing Objectives at all times will be achieved. Assurances to enter into discussions and to seek third party approval are not sufficient to amount to enforceable conditions and thus the Licensing Objectives have not been treated as paramount. See further the comments in Section 2 of this Representation	See comment to the left and in Section 2 of this Representation
	Para. 9.8	X	The local authority and Police are under a duty to do all they reasonably can to prevent crime an disorder in their area.	X ALL See comments to the right. It follows from the lack of approval operational plans that the Local Authority and Police are not in a position to meet this duty.	THFC are of the view that in failing to provide sufficient operational information to the Police and to the various Responsible Authorities (and including information relating to approved operational plans in their operating schedules) in advance of making the formal applications, these Authorities cannot fulfil their

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<p>duty as stipulated in paragraph 9.8 of the Statement of Licensing Policy.</p>			<p>THFC are of the view that in failing to provide sufficient operational information to the Police and to the various Responsible Authorities (and including information relating to approved operational plans in their operating schedules) in advance of making the formal applications, these Authorities cannot fulfil their duty as stipulated in paragraph 9.8 of the Statement of Licensing Policy.</p>
<p>THFC are of the view that in failing to provide sufficient operational information to the Police and to the various Responsible Authorities (and including information relating to approved operational plans in their operating schedules) in advance of making the formal applications, these Authorities cannot fulfil their duty as stipulated in paragraph 9.8 of the Statement of Licensing Policy.</p>	<p>X ALL See comments to the right and specifically in Section 2 of the Representation below. The Applicants have failed to particularise the means by which they will meet the Special Factors for Consideration in the Statement of Licensing Policy. These Special Factors go to all four Licensing Objectives.</p>	<p>An Operating Schedule is submitted with a Licence Application and contains the information required by section 17(4). Among other things, it includes the steps that the Applicant proposes to take to promote the Licensing Objectives. Where a risk to the Licensing Objectives is present, the Council expects applicants to specifically address in their operating schedules how they will meet the Special Factors for Consideration. The scarcity of information in the operating schedules fails to demonstrate how in reality the LOS will be treated and enforced as paramount.</p>	<p>X ALL See comments to the right and specifically in Section 2 of the Representation below. The Applicants have failed to particularise the means by which they will meet the Special Factors for Consideration in the Statement of Licensing Policy. These Special Factors go to all four Licensing Objectives.</p>
<p>THFC are of the view that in failing to provide sufficient operational information to the Police and to the various Responsible Authorities (and including information relating to approved operational plans in their operating schedules) in advance of making the formal applications, these Authorities cannot fulfil their duty as stipulated in paragraph 9.8 of the Statement of Licensing Policy.</p>	<p>X ALL See comments to the right and specifically in Section 2 of the Representation below. The Applicants have failed to particularise the means by which they will meet the Special Factors for Consideration in the Statement of Licensing Policy. These Special Factors go to all four Licensing Objectives.</p>	<p>Special Factors for Consideration. The "means" by which each of the Licensing Objectives will be promoted must be detailed in the Operating Schedule. The steps suggested by the Applicants are insufficient comprising a standard but incomplete list of common measures without consideration of the locality, other major events and/or how the steps can be codified into enforceable conditions.</p>	<p>X ALL See comments to the right and specifically in Section 2 of the Representation below. The Applicants have failed to particularise the means by which they will meet the Special Factors for Consideration in the Statement of Licensing Policy. These Special Factors go to all four Licensing Objectives.</p>
<p>No details have been provided by the Applicants as to how they intend to run safe events at the proposed premises when existing licensed events are taking place at neighbouring large venues including the Stadium; London Stadium; Alexandra Palace etc.... Transport Plans relating to the operation of Tottenham Hotspur Stadium (and no doubt similar plans are in place for the operation of London Stadium) as part of their GSC. These plans have been approved by the Authorities</p>	<p>X ALL but specifically public safety See comments to the right. It is incumbent on the Applicant to satisfy the Licensing Committee and Responsible Authorities (and interested Parties) that it could operate a large scale event on any day of the week when other large scale licensed events will be taking place at other venues which already have the benefit of Premises Licences and in some cases GSCs.⁸ In simple terms the Applicants have completely failed to articulate in their application/Operating Schedule how they will ensure the safe transportation of between 10,000 and 40,000 from their proposed "Premises" when the local transport infrastructure is already fully utilised by licensed events in the vicinity.</p>	<p>This paragraph specifically provides that to promote Public Safety, the Applicants should provide "the means by which risk to public safety will be ...prevented by effective management and operation of the licensed activities including ...the adequacy of transportation arrangements to ensure that customers may safely travel to and from the premises and nuisance is avoided by concentrations of people unable to access transport in a timely manner" The steps suggested by the Applicants are insufficient comprising a standard but incomplete list of common measures without consideration of the locality, other major events and/or how the steps can be codified into enforceable conditions.</p>	<p>X ALL but specifically public safety See comments to the right. It is incumbent on the Applicant to satisfy the Licensing Committee and Responsible Authorities (and interested Parties) that it could operate a large scale event on any day of the week when other large scale licensed events will be taking place at other venues which already have the benefit of Premises Licences and in some cases GSCs.⁸ In simple terms the Applicants have completely failed to articulate in their application/Operating Schedule how they will ensure the safe transportation of between 10,000 and 40,000 from their proposed "Premises" when the local transport infrastructure is already fully utilised by licensed events in the vicinity.</p>

⁸ GSC = General Safety Certificate

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				<p>following considerable consultation and planning. They have been approved and adopted and are now operational.</p>
<p>2. Operating Schedule Deficiencies</p>	<p>X ALL</p> <p>General Principles</p> <p>THFC's representation in relation to the matters set out in this section are essentially on the basis that the Applicant has failed to give sufficient detail in its Operating Schedule of its intended operation let alone of the measures that will be implemented to promote the Licensing Objectives.</p> <p>The paucity of information in the Operating Schedule is obvious with the Applicant essentially stating that because the Units are not fitted out as suitable licensed premises (with bar locations; audience spaces; staging; lighting; clear access and egress points etc..) all the information will follow. In our view this approach is irresponsible and provides no details on which the Responsible Authorities or Licensing Committee could be satisfied that the planned licensable events will be conducted in a manner that promotes the Licensing Objectives.</p> <p>The lack of detail in the Operating Schedule is all the more concerning when the Applicants have already promoted and sold tickets to a large capacity Event – Field Day – in June 2019 (see Appendix 3). Arranging such an Event without first preparing the necessary operational plans (including those relating to Noise Management; Emergency Contingency Plans; Transportation; etc) and entering into full consultation with the Responsible Authorities and relevant Other Persons (such as THFC and operators of other major licensed venues in close proximity), appears incredible. If</p>	<p>X Regulation 17(4); the Guidance to the Act and Enfield Council's Statement of Licensing Policy all set out requirements regarding the contents of the Operating Schedule. These requirements are to ensure that the level of detail in the Operating Schedule is sufficient to enable the Responsible Authorities to fulfil their duties; to enable Interested Parties and/or Other Persons to consider what is planned, and ultimately to enable the Licensing Committee to consider whether sufficient measures have been offered to ensure that the Licensing Objectives (which are of paramount importance) will be promoted if the licence is issued.</p> <p>The Operating Schedules lodged by the Applicants are deficient as they lack the required detail. For example (but not limited to):</p> <p>Application for Meridian Water, Units 4, 5, 6 6a & b:</p> <ul style="list-style-type: none"> The general description of the proposed premises is devoid of detail for example it provides no information about the size of the 4 or 5 units; where they are positioned in the overall site; whether the proposed "Premises" includes any outside space; whether the Units are single-storey The assurance that a "detailed plan of each event" will be provided to the Responsible Authorities is meaningless – to whom at the Responsible Authorities; when will it be provided; what happens if the Responsible Authorities are unhappy about the contents of the plan? The Application refers to the above Units but promotional materials identify different Units – See information at Appendix 3. The Operating Schedule is devoid of any meaningful detail relating to each of the following proposed licensable activities: <ul style="list-style-type: none"> Plays – proposed to take place from 08:00 to 06:00 daily; States that the activity will take place daily for 22 hours a day; 		

		<ul style="list-style-type: none"> • States that the activity indoors and outdoors but no outdoor space is identifiable from the plan submitted with the application; • No information is given relating to where in the Units the Plays will take place; the position of any staging; audience profile/numbers; • No information is provided relating to operational details <p>Films – proposed to take place from 08:00 to 06:00 daily:</p> <ul style="list-style-type: none"> • States that the activity will take place daily for 22 hours a day; • States that the activity indoors and outdoors but no outdoor space is identifiable from the plan submitted with the application; • No information is given relating to where in the Units the films will be shown; the position of any screens; audience profile/numbers; • No information is provided relating to operational details. <p>Indoor Sporting Events – proposed to take place from 08:00 to 06:00 daily:</p> <ul style="list-style-type: none"> • States that the activity will take place daily for 22 hours a day; • No information about the likely nature of the sport; • No information is given relating to where in the Units the sport will take place; the position of any sporting equipment; audience profile/numbers; • No information is provided relating to operational details <p>Boxing or Wrestling – proposed to take place from 08:00 to 06:00 daily:</p> <ul style="list-style-type: none"> • States that the activity will take place daily for 22 hours a day; • States that the activity indoors and outdoors but no outdoor space is identifiable from the plan submitted with the application; • No information is given relating to where in the Units boxing/wrestling will take place; audience profile/numbers; • No information is provided relating to operational details <p>Live Music – proposed to take place from 08:00 to 06:00 indoors daily/9:00 to 22:30 outdoors daily:</p> <ul style="list-style-type: none"> • States that the activity will take place daily indoors for 22 hours a day; outdoors for 13.5 hours daily; • States that the activity indoors and outdoors but no outdoor space is identifiable from the plan submitted with the application; • No information is given relating to where in the Units the activity will be conducted; the position of any staging or other demountable structures; audience profile/numbers; • No information is provided relating to operational details including no agreed Noise Management specifics. 	<p>those plans are in existence, they should have been provided as part of the application. Such plans are all the more important where the proposed "Premises" does not have the infrastructure (managerial or operational) for putting on events involving licensable activities.</p>
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		<p>Recorded Music – proposed to take place from 08:00 to 06:00 indoors daily/9:00 to 22:30 outdoors daily:</p> <ul style="list-style-type: none"> • States that the activity will take place daily indoors for 22 hours a day; outdoors for 13.5 hours daily; • States that the activity indoors and outdoors but no outdoor space is identifiable from the plan submitted with the application; • No information is given relating to where in the Units the activity will be conducted; the position of any staging or other demountable structures; audience profile/numbers; • No information is provided relating to operational details including no agreed Noise Management specifics. <p>Dance (and similar activities to music and dance) – proposed to take place from 08:00 to 06:00 daily:</p> <ul style="list-style-type: none"> • States that the activity will take place daily for 22 hours a day; • States that the activity indoors and outdoors but no outdoor space is identifiable from the plan submitted with the application; • No information is given relating to where in the Units Dance performances will take place; the position of any staging; audience profile/numbers; • No information is provided relating to operational details or agreed noise management measures (if any) <p>Late Night Refreshment – proposed to take place daily from 23:00 to 05:00</p> <ul style="list-style-type: none"> • States that the activity indoors and outdoors but no outdoor space is identifiable from the plan submitted with the application; • No information is provided relating to operational details <p>Sale of Alcohol – proposed to take place from 08:00 to 06:00 daily:</p> <ul style="list-style-type: none"> • States that the activity will take place daily for 22 hours a day; • States that sales will be for consumption on and off the Premises; • No information is given relating to where in the Units bars will be situated; • The likely nature of any on or off sales. <p>Opening Hours: 08:00 to 06:00 daily:</p> <ul style="list-style-type: none"> • States that the Premises will be open daily for 22 hours a day. <p>Section M – Steps to promote the Licensing Objectives is deficient as:</p> <ul style="list-style-type: none"> • The plans listed in Section M(A) (1) are not in existence and assurances to provide appropriate plans are insufficient. If paragraph (1) is intended to be a condition on the licence it would be meaningless and unenforceable. M(A)(3) – is unclear as suggests that for some events the capacity will not be limited to 9,999 (inclusive of staff and performers); 	
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		<ul style="list-style-type: none"> • M(A)(7) – this is vague – the applicant failing to identify numbers of door supervisors depending on capacity of event and risk assessment level; who will conduct the Risk Assessment; the form of Risk Assessment; the search policy that will apply depending on Risk etc... • M(A)(9) – The “operational plan” referred to herein does not appear to be available; the crowd management plan also appears to be aspirational. • M(A)(10) – Transport Options – this fails to demonstrate any understanding of the locality and in particular existing pressures on the transport infrastructure. • M(A)(18) – This suggested condition relating to CCTV is not sufficiently precise; • M(A)(19) – This suggested condition is vague and unenforceable; it is unclear whether a “transport statement” exists but it was not served with the application and does not form part of the Operating Schedule. • M(A)(22) – Event “Overview” – this suggested condition is vague and meaningless. The Responsible Authorities cannot be expected to manage the licensed premises; • M(A)(24) – This is a vague and unenforceable condition ; • M(A)(26) - This is a vague and unenforceable condition; • M(A)(27) to (32) These are vague and unenforceable condition, as they fail to identify who is responsible for compliance and/or refer to non-existent plans. • M(A)(36) This is vague and unenforceable as no Venue Operational Plan has been made available. • M(A)(37) This condition is inappropriate and unenforceable – see general principles. <p>Application for Meridian Water, Units 4, 5, 6 6a & b, and Land to the south of Units 4, 5, 6, 6a and 6b:</p> <ul style="list-style-type: none"> • As this application is virtually identical to the “Units only” application, the bullets listed above are repeated in their entirety as applicable to this “Festival Licence” application – save that the plan submitted in support of this application does include outdoor space. • In addition: <ul style="list-style-type: none"> • The general description is equally vague. Mention is made of “warehouses” rather than “Units”; again no details are given as to the size of the “warehouses” or whether they are one/two storeys; • The suggestion that the proposed “Premises” is suitable for 25,000 (let alone 40,000) is not supported by information in its Operating Schedule; • Again a “detailed layout plan” showing details “will be provided” and this will apparently be “agreed through the SAG progress”. This is entirely inappropriate for the reasons set out in section 3 below. 	<p>X ALL</p> <p>General Principles</p> <p>THFC’s representation in relation to the matters set out in this section are essentially on the basis that the Applicant has failed to give sufficient detail in its Operating Schedule of its intended operation let alone of the measures that will be implemented to promote the Licensing Objectives.</p> <p>In simple terms the Applicant is proposing that it will put on festivals and similar events with initially 25,000 people but then increasing to 40,000, subject only to obtaining approval from a SAG. For the reasons set out in Section 3 below, this submission is fundamentally flawed as the purpose of a SAG is not to approve events; nor to</p>
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		<p>Section M – Steps to promote the Licensing Objectives is deficient as</p> <ul style="list-style-type: none"> The proposal that “the running of the festival and/or large scale events and licensing requirements will be approved by a formal SAG process” is inappropriate and unenforceable. See General Principles and Section 3 below. For the same reasons, it is a fallacy to submit that any “EMSP” or any of the Plans listed in M(b)(1a) to (i) will be subject to “the requirements of the Licensing Authority and the Enfield Safety Advisory Group”; in relation to the former – the Licensing Authority does not have powers to approve or disapprove arrangements after a licence has been granted. The SAG has no authority to approve or disapprove operational plans provided by the Applicant. M(b)(2) – Again this is inappropriate and/or vague – there being no defined SAG “process” and a SAG being only advisory in nature. M(b)(4) This proposed condition is valueless as it is based on conditions which are in themselves unenforceable; M(b)(9) to (13), (18), (19) are a repetition of the proposed conditions in relation to the “Units only” application so the comments made in opposition are equally applicable to this application. M(b)(22) – The suggested condition regarding consulting with THFC (in view of the proximity of Tottenham Hotspur Stadium “to collaboratively manage events is vague; meaningless and unenforceable. M(b)(23) – This is a vague and unenforceable condition as it appears the Crowd Management Plan or the Drugs Policy are not yet in existence. M(b)(26) - This is a vague and unenforceable condition M(b)(27) - This is a vague and unenforceable condition as the Safety Advisory Group is not in a position to agree (or disagree) the measures proposed by the Applicants. M(b)(28) and (29), (32) to(37) - These proposed steps are vague would not be enforceable condition, as they fail to identify who is responsible for compliance and/or refer to non-existence plans. M(A)(42) This condition is rendered ineffectual as the Event Management and Safety Plan has not been provided and any EMSP that is developed. 	<p>stipulate licensing requirements. Any SAG is an advisory group and it has not powers (and it is not its role) to stipulate licensing conditions – that is the role of the Licensing Committee</p> <p>See above comments</p> <p>Tottenham Hotspur Stadium, London Stadium; Alexandra Palace and other major venues in close proximity to the proposed “Premises” already have the benefit of Premises Licences (and in some cases General Safety Certification). The Applicants cannot proffer conditions which involve third parties over whom they have no control. It is for the Applicants to satisfy the Licensing Committee that they can operate their licensed premises without negatively impacting on the community including those licensed premises which have had to go through the process of obtaining suitable licences for their respective operations.</p>
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<p>3. Inappropriate Usurpation of powers from Licensing Authority to SAG</p>		<p>through the SAG as suggested by the Applicants is incapable of being "approved" and of being an enforceable condition on the licence.</p>	<p>Both applications made by the Applicants are devoid of sufficient detail (as set out in the Operating Schedules) to enable the Responsible Authorities and the Licensing Committee to properly assess whether the proposed large scale events (involving a maximum of 40,000 people) could take place without negatively impacting on the Licensing Objectives.</p> <p>It is the Licensing Committee (or Licensing Authority under delegated powers, where applicable) that has the power to grant a licence subject to conditions. Conditions cannot be developed by third parties after the event (i.e. at some stage in the future post issue of the Licence) and "slotted into" the conditions on the Licence.</p> <p>The Applicants by repeatedly suggesting that various operational and management plans will materialise (post issue of a Premises Licence) following the "agreement" with SAG are attempting to usurp the function of the Licensing Committee. It is the Licensing Committee that must carry out its functions under the Licensing Act 2003 with a view to promoting the licensing objectives. In carrying out its duties the Licensing Authority must also have regard to its own Licensing Statement and the Guidance under the Licensing Act 2003.</p>	<p>(s.4) (s.5)</p>
		<p>X ALL</p>		

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<p>4. Inappropriate delegation of operational responsibilities by Applicant to SAG</p>			<p>In summary the Applicants are inviting the Licensing Committee to issue two licences for ill-defined "Premises", for large capacity audiences (up to 40,000) on assurances that operational and management plans will follow and will be subject to the approval of a SAG. This approach is fundamentally flawed for the reasons already set out above.</p> <p>SAG does not have the power to approve plans or to stipulate that certain steps will become licence conditions. At best, the applications suggest a misunderstanding of the powers of a SAG; at worst, they risk being viewed by Interested Parties as an attempt to obtain wide-reaching, late licences for large capacity events "through the back door".</p> <p>SAG's are advisory and have no legal status. Further there is a dearth of information even about the SAG that the Applicant is proposing be involved, in the future, as proposed in its applications. No information has been provided concerning the proposed terms of reference for the SAG or who the core membership of the SAG is likely to comprise. No information has been adduced to demonstrate that the proposed core member of the SAG have agreed to be part of it. From the scarcity of information provided by the Applicant, there is no evidence to demonstrate that they have considered the recommendations in the Purple Guide⁹ (section 25) or similar publication concerning the role of SAGs.</p>	<p>X ALL</p> <p>The scarcity of information in the operating schedules fails to demonstrate how in reality the LOS will be treated and enforced as paramount.</p> <p>The steps suggested by the Applicants are insufficient comprising a standard but incomplete list of common measures without consideration of the locality; other major events and/or how the steps can be codified into enforceable conditions.</p>	<p>No disrespect to SAG's is intended; they carry out an incredibly valuable role in providing guidance to event operators.</p> <p>However, it is highly inappropriate to advance that operational and/or management plans will be approved by SAG's. The ground/venue/"Premises" management is responsible for formulating their plans. Where the premises do not need to obtain a GSC, those plans should, in our view, be in existence in advance of any Premises Licence being sought.</p>
<p>5. Failure to establish that the Licensing Objectives will be promoted</p>			<p>Without fully articulated plans supporting the Licensing Objectives having been produced in advance of the applications, upon which the Responsible Authorities have had time to reflect, all four licensing objectives will inevitably be negatively impacted as a result of the proposed large scale licensable events at the proposed "Premises". Where there is a lack of infrastructure supporting licensable activities the Applicant is under a greater obligation to ensure that its Operating Schedules provide a detailed framework – confirming what processes have already been developed to ensure that the Licensing Objectives are promoted.</p>	<p>X ALL</p> <p>The scarcity of information in the operating schedules fails to demonstrate how in reality the LOS will be treated and enforced as paramount.</p> <p>The steps suggested by the Applicants are insufficient comprising a standard but incomplete list of common measures without consideration of the locality; other major events and/or how the steps can be codified into enforceable conditions.</p>	

⁹ The Purple Guide - section 25 – Working in a Safety Advisory Group – see also Appendix 3.

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The Licensing Authority
London Borough of Enfield
By Email Only

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Our Ref: SED/TOT9/10
Your Ref:
Date: 23 January 2019

Dear Sirs

Relevant Representation against the issue of a new Premises Licence relating to Gas Works/Meridian Water Site and Warehouse, Enfield N18 3BW ("Gas Works Site"), and/or Unit 4, 5, 6 and Land to the South, Orbital Business Park, 5 Argon Road, Enfield N18 3BW ("Orbital Site").

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 two recent applications made by the Applicant (Broadwick Venues Limited) seeking Premises Licence(s) in relation to proposed licensed "Premises" as identified in the above heading.

Background

Our understanding is that in December 2018, an application was issued by the Applicant relating to the Gas Works Site, seeking, amongst other matters:

1. An indefinite Premises Licence allowing for licensable activities of all categories of Regulated Entertainment (including Boxing and Wrestling); the Sale of Alcohol by Retail and Late Night Refreshment, from 08:00 to 06:00 so for 22 hours daily;
2. The proposed "Premises" involves a number of warehouses/sheds and a large expanse of open land bordered by waterways;
3. The authorisation sought would enable an audience of up to 49,999 people at events;
4. Draft conditions have been proposed in section M of the LIC 2 Application Form to support the application – but see our later comments regarding these.

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5. A Site Plan – with no address or postcode and not to scale, and not compliant with Regulation 23 of the 2005 Licensing Regulations – was provided by the Applicant

The above application was advertised in the local paper with a “Last Date for Representations” (LDR) of 18 January 2019.

Whilst considering a response to the above Application, we then discovered a second application on page 75 of your Authority’s “License Register” webpage relating to the “Orbital Site” (as defined in the heading to this letter). This application appears:

1. To be in the **same terms** as the Gas Works Site application save that the “Premises” are given a different name and address (although the postcode remains the same);
2. To have been issued **without a plan** (or at least one could not be located on the register of applications).
3. To suggest that the LDR is **6 February 2019**, the application having been issued on 9TH January 2019.

Information provided by Licensing Authority on 17 January:

We have since spoken to one of your Licensing Officers who has kindly confirmed that:

1. The Gas Works Site application is no longer effective – it being rejected by the Licensing Authority due to the proposed “Premises” being inadequately described;
2. The effective application is that relating to the “Orbital Site” with a LDR of 6 February 2019;
3. Whilst the Licensing Officer could not open the plan on the system she believes that the plan is substantially the same as lodged previously;
4. The Orbital Site application seems to be in the same terms as the Gas Works Site application;
5. A provisional Committee Hearing date has been listed for 10am on **6 March 2019**.

In the event of any of the above information being inaccurate, kindly email the writer at Sue.dowling@blandy.co.uk as a matter of urgency.

Representation against the above application(s)

In any event, our clients hereby make Representations against the issue of a new Premises Licence (for the Gas Works or for the Orbital Site) on the basis of all four Licensing Objectives under the Licensing Act 2003. Our client is firmly of the view that if the proposed Premises Licence is granted allowing for events to take place with audiences of almost 50,000 people,



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this is likely to have very significant, and serious, negative consequences for crime and disorder; public nuisance and public safety, and further could act contrary to the licensing objective that children be protected from harm.

Our client's Representation comprises three fundamental parts:

1. **General Principles** namely that the application is inappropriate (as being contrary to the four licensing objectives) when viewed in the context of existing licensed Premises in the vicinity;
2. **Procedural irregularities:** The Application is defective procedurally. Without limiting the aforesaid, the plan submitted fails to show any of the information required under Regulation 23(3)(a) to (j); and/or
3. **Inadequacy of information in the draft Operating Schedule and/or inappropriate conditions:** The information included in the LIC 2 Application (and in particular the Operating Schedule and draft conditions) is inadequate to ensure the promotion of the Licensing Objectives.

General Principles:

As Enfield Council is aware, our clients are supportive, in principle, of regeneration efforts in the vicinity of its new stadium (including the Meridian Water scheme specifically). They fully appreciate that the development of disused sites (such as the suggested "Orbital Site") for useful purposes to add value to the community (through the generation of jobs; development of culture etc.) will often be valuable and also that temporary 'meanwhile uses' can also contribute to place-making, pending the implementation of longer term redevelopment.

However, when a proposed Premises Licence is sought for what appears to be largely an open-air site for multi-use, large-capacity; late-night events (in a heavily populated city), it is, in our view, clearly insufficient for an Applicant to only consult with the Responsible Authorities for that Licensing Authority. Instead, it is reasonable to expect, the Applicant to conduct wider consultation with others who will obviously be affected by the application such as the operators of nearby substantial venues falling within nearby boroughs, and the Responsible Authorities for those venues. This principle is clear from the Revised Guidance to the Licensing Act (paragraph 8.13) and makes obvious sense to ensure a joined-up approach to the co-ordination of large scale events, and their impact on public resources. Our clients, as operators of the new Tottenham Hotspur Stadium, and other local (and city-wide) Authorities and organisations have an obvious (and crucial) role to play in any consultation relating to the Orbital Site application. To issue a formal application seeking a new Licence in such wide-reaching terms without first completing comprehensive consultation (beyond the statutory minimum) is arguably irresponsible.



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Our understanding from our clients is that no such meaningful consultation has taken place prior to, or following, the lodging of the licence application. Indeed, the current application was brought to our client's attention by a third party. The submission of the first licence on 24 December 2018 immediately ahead of the Christmas and New Year holiday period, without any notification suggests little appetite for engagement with our client. If they had been invited to participate in any consultation, it would have been apparent that the current application, for the Orbital Site, is not viable as it takes no account of the fact that:

1. The new Tottenham Hotspur Stadium (situated less than a mile from the Orbital Site and sharing many public transport facilities) will be operating (and has a Premises Licence, and appropriate planning consents to do so) "Bowl" Events on at least 46 occasions per annum. These large scale events will include unlimited football matches; other sporting Events (e.g. NFL) and up to 6 music concerts.

The capacity of the new Stadium is over 62,000, and with such large numbers of spectators/audiences coming to and from the Stadium on an almost weekly basis, considerable planning and consultation has already taken place between our clients and numerous agencies to ensure that the Stadium (including the licensed operation therein) can be operated safely. These multiple agencies include (but are not limited to) The Metropolitan Police (various levels from local Police to HQ/Gold Command); Transport for London; Network Rail; Emergency Services providers; The Fire Authority and the Responsible Authorities for Haringey Council – with input taken from those agencies to ensure that the Stadium can operate effectively and safely for all those visiting and working there. In addition, considerable planning work has been undertaken by a number of experts in the field of operating large scale events (for example crowd-modelling experts; acoustic consultants; transport planners), and their expert opinions have been fed into transport; noise management and other operational plans – again with a view to ensuring that the Stadium events are enjoyable for those attending and working at them but minimising the risk of local residents and businesses being negatively impacted as they go about their business in the locality (including using public transport).

One of the more significant challenges faced by our clients has been the delay to the completion of both the Network Rail and London Underground Limited works at Tottenham Hale station, meaning a limited station capacity. Whilst Tottenham Hale is one of four stations serving our client's new Stadium (in addition to the enhanced transport services it is laying on separately), any events at the Orbital Site would be almost wholly depending upon that station, particularly in advance of the completion and commissioning of Meridian Water station and Enfield Council's access works around it.



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As well as the Stadium having the benefit of a Premises Licence, it will also have a General Safety Certificate as required for an open-air sports ground, and again that Certificate has been developed after months of consultation and discussion with the various Authorities mentioned above. Access to and egress from the Stadium is a fundamental aspect of the GSC and of course, in practice this means the availability of a reliable (and available) public transport system.

The Premises Licence for the Stadium was granted in June 2018, after considerable work was undertaken by numerous individuals and organisations – with bespoke licence conditions to ensure that the licensing objectives are promoted.

2. If a large-scale event (i.e. involving c 3,000 or more spectators) was held at the Orbital Site on the same day/evening as a Stadium Bowl Event – this would not only (in all likelihood) bring the public transport system to a standstill, but would also result in the Authorities being over-stretched in the community – putting at risk not only those attending events at the Stadium and/or the Orbital Site event but also those living in the community. It would in all likelihood subject the Police; Transport Authorities and Fire Authorities to an unacceptable level of operation and risk.

Defective Procedural Requirements

At the time of writing, we have not been able to obtain a copy of the plan which supports the Orbital Site application but the plan supporting the original Gas Works Site application is clearly not compliant with Regulation 23 – as explained above. In particular, the plan does not explain which licensable activities are likely to be conducted where in the proposed Premises.

Inadequate Operating Schedule and Draft Conditions

We have not as yet had sight of the LIC 2 form relating specifically to the Orbital Site application, so this aspect of the Representation may be amended in due course.

We have assumed for now that the LIC 2 Application form is in similar terms to the form which related to the Gas Works Site application. Our observations in relation to the latter are as follows:

1. We note that the Applicant seeks an indefinite Premises Licence for licensable activities for 22 hours a day for up to 49,999 people – indoors and outdoors. Without any history of successful trading at the proposed Premises and in view of the scant information in the LIC2 Application and the lack of comprehensive consultation, the Licensing Authority may be of the view that an indefinite licence is wholly inappropriate as such could seriously jeopardise the safety of those visiting



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the proposed "Premises"; visiting other places (including, but not limited to, the Stadium) close-by and indeed even the safety of local residents and businesses in the locality who/which may need public facilities, whilst going about their daily business.

2. The information on page 4 regarding the size of planned events falling under three categories (a, b and c) and repeated on page 17 in section M(a)(1) to (4) differs from the capacity bands in proposed condition (2) also page 17 causing confusion; ambiguity and rendering the conditions ineffective and unenforceable.
3. Sections A to I (pages 5 to 12) – The Applicant has failed to provide any information relating to the planned licensable activities save for stating that they would take place indoors and outdoors for a maximum of 22 hours daily. Consequently if granted, the Licence would authorise extreme activities which clearly would not be acceptable to those in the community. For example, the Applicant is seeking permission to have Boxing entertainment outdoors for up to 49,999 people starting at 8 am and finishing at 6 am the following morning, on a daily basis without providing any further information regarding the proposed activity. The same applies in relation to the "sale of alcohol by retail" (see section J on page 14) – with the Applicant again providing no supplementary information (either in its plans or in the LIC 2 Form).
4. Section M – Page 17 – Our observations are that these measures/draft conditions are insufficient and/or inappropriate and/or ineffectual as unenforceable, due to the "general principles" set out above and the following specific points:

Section M:

(a)(1): The capacity bands are *not consistent* with those specified at (b)(2);

(b):

(4) This condition is vague and is dependent on a third party (the "Group") making a request, which is inappropriate (it being the Applicant's responsibility to run any licensable activities in a manner promoting the Licensing Objectives). The condition is unenforceable in its current draft;

(5) The process referred to therein is not defined and consequently ambiguous and probably unenforceable;

(6) This condition is not sufficiently precise. Further "submission" of plans etc.. is insufficient and again relies on third party actions;

(7) One assumes that this is supposed to refer to the documentation set out in condition (6) rather than condition (5) but in our view, the condition is still meaningless and unenforceable. At the very least one would expect more precision about the approval process of the various operation plans; by whom and what process has to be followed (including full information regarding risk assessment



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procedures). This condition also takes no account of the lack of resources from which many Licensing Authorities/Responsible Authorities and SAG Groups suffer. What protection is there if inadequate plans are submitted but the Authorities do not have the manpower or opportunity to revert to the Applicant?

(8) This draft condition is unenforceable and effectively meaningless. The obvious difficulty is what transpires if our clients do not support any event at the Orbital Site due (perhaps) to an Event taking place at the Stadium (or at one of its other licensed venues including the Southern Plaza near to the Stadium)? Phrases such as "having regards to" and "consulting with" are too vague.

(9) This draft condition means very little without sight of the "bespoke" plans – are a copy available?

(15) This condition is meaningless and unenforceable without the different areas of the Premises being clearly defined.

(16) It is unclear whether this condition is supposed to relate to SIA licensed door supervisors.

(19) No minimum staffing levels are provided; also there are no conditions relating to the use of appropriately trained stewards for the size of audience.

(29) First aid condition – this is insufficient in view of the fact that an event may hold 49,999 people.

At the very minimum for a proposed venue with a maximum capacity of over 50,000 with staff and performers and in close proximity to a Stadium (with a capacity of over 62,000) one would expect that any Premises Licence would not be issued or certainly would not be effective until such time as:

1. All of the plans listed in draft condition 6 have been provided in writing in draft form to (as a minimum) the Responsible Authorities for Enfield and for Haringey; to the MET (HQ/Gold Command as well as local licensing Police for both boroughs; Emergency Services; TfL and to our clients;
2. A comprehensive consultation process has taken place (in a sensible time-scale to allow for the existing commitments of all those involved) regarding those draft plans to ascertain whether the provisions contained therein are feasible and are consistent with the Licensing Objectives;



BLANDY & BLANDY

Solicitors

3. The Responsible Authorities for Enfield (having taken input from Haringey Responsible Authorities and other interested persons) have approved the plans listed in condition 6 for all Categories of events.

In view of the detailed Representation above and the very serious concerns that this premature Premises Licence application has raised, the Applicant may consider it best to withdraw its application, at least until such time as comprehensive consultation has taken place.

Kindly confirm safe receipt of this letter of Representation 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

Yours faithfully

Blandy & Blandy LLP

UNITS

1

10,000

units only.

Wk

218074640

London Borough of Enfield

Application for a premises licence to be granted under the Licensing Act 2003

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

Before completing this form please read the guidance notes at the end of the form. If you are completing this form by hand please write legibly in block capitals. In all cases ensure that your answers are inside the boxes and written in black ink. Use additional sheets if necessary.

You may wish to keep a copy of the completed form for your records.

I/We Broadwick Venues Limited

(Insert name(s) of applicant)

apply for a premises licence under section 17 of the Licensing Act 2003 for the premises described in Part 1 below (the premises) and I/we are making this application to you as the relevant licensing authority in accordance with section 12 of the Licensing Act 2003

Part 1 - Premises Details

Postal address of premises or, if none, ordnance survey map reference or description			
Meridian Water Units 4, 5, 6, 6a&b Orbital Business Park 5 Argon Road Edmonton			
Post town	London	Postcode	N18 3BW

Telephone number at premises (if any)	
Non-domestic rateable value of premises	Not rated

Part 2 - Applicant Details

Please state whether you are applying for a premises licence as

Please tick as appropriate

- a) an individual or individuals * please complete section (A)
- b) a person other than an individual *
 - i. as a limited company please complete section (B)
 - ii. as a partnership please complete section (B)
 - iii. as an unincorporated association or please complete section (B)
 - iv. other (for example a statutory corporation) please complete section (B)
- c) a recognised club please complete section (B)
- d) a charity please complete section (B)

- e) the proprietor of an educational establishment please complete section (B)
- f) a health service body please complete section (B)
- g) a person who is registered under Part 2 of the Care Standards Act 2000 (c14) in respect of an independent hospital in Wales please complete section (B)
- ga) a person who is registered under Chapter 2 of Part 1 of the Health and Social Care Act 2008 (within the meaning of that Part) in an independent hospital in England please complete section (B)
- h) the chief officer of police of a police force in England and Wales please complete section (B)

* If you are applying as a person described in (a) or (b) please confirm:

Please tick yes

I am carrying on or proposing to carry on a business which involves the use of the premises for licensable activities; or

I am making the application pursuant to a
 statutory function or
 a function discharged by virtue of Her Majesty's prerogative

(A) INDIVIDUAL APPLICANTS (fill in as applicable)

Mr <input type="checkbox"/>	Mrs <input type="checkbox"/>	Miss <input type="checkbox"/>	Ms <input type="checkbox"/>	Other Title (for example, Rev)	
Surname			First names		
I am 18 years old or over				<input type="checkbox"/> Please tick yes	
Current postal address if different from premises address					
Post town				Postcode	
Daytime contact telephone number					
E-mail address (optional)					

SECOND INDIVIDUAL APPLICANT (if applicable)

Mr <input type="checkbox"/>	Mrs <input type="checkbox"/>	Miss <input type="checkbox"/>	Ms <input type="checkbox"/>	Other Title (for example, Rev)	
Surname			First names		
I am 18 years old or over				<input type="checkbox"/> Please tick yes	
Current postal address if different from premises address					
Post town				Postcode	
Daytime contact telephone number					
E-mail address (optional)					

(B) OTHER APPLICANTS

Please provide name and registered address of applicant in full. Where appropriate please give any registered number. In the case of a partnership or other joint venture (other than a body corporate), please give the name and address of each party concerned.

Name Broadwick Venues Limited
Address 30 Leicester Square London WC2H 7LA
Registered number (where applicable) 10884920
Description of applicant (for example, partnership, company, unincorporated association etc.) Company
Telephone number (if any)
E-mail address (optional)

Part 3 Operating Schedule

When do you want the premises licence to start?

DD	MM	YYYY
A	S	A P

If you wish the licence to be valid only for a limited period, when do you want it to end?

DD	MM	YYYY

Please give a general description of the premises (please read guidance note 1)

Multi-function event space for a mixture of corporate events, product launches, formal dinners, food and beer festivals, live music and DJ led music events.

Temporary stages, bars, toilets and seating to be in situ on an event by event basis. A detailed plan of each event will be provided to the responsible authorities.

If 5,000 or more people are expected to attend the premises at any one time, please state the number expected to attend.

9,999

What licensable activities do you intend to carry on from the premises?

(Please see sections 1 and 14 of the Licensing Act 2003 and Schedules 1 and 2 to the Licensing Act 2003)

Provision of regulated entertainment

Please tick any that apply

- a) plays (if ticking yes, fill in box A)
- b) films (if ticking yes, fill in box B)
- c) indoor sporting events (if ticking yes, fill in box C)
- d) boxing or wrestling entertainment (if ticking yes, fill in box D)
- e) live music (if ticking yes, fill in box E)
- f) recorded music (if ticking yes, fill in box F)
- g) performances of dance (if ticking yes, fill in box G)
- h) anything of a similar description to that falling within (e), (f) or (g) (if ticking yes, fill in box H)

Provision of late night refreshment (if ticking yes, fill in box I)

Supply of alcohol (if ticking yes, fill in box J)

In all cases complete boxes K, L and M

A

Plays Standard days and timings (please read guidance note 6)			<u>Will the performance of a play take place indoors or outdoors or both – please tick</u> (please read guidance note 2)	Indoors	<input type="checkbox"/>
Day	Start	Finish		Outdoors	<input type="checkbox"/>
				Both	<input checked="" type="checkbox"/>
Mon	08:00	06:00		<u>Please give further details here</u> (please read guidance note 3)	
Tue	08:00	06:00			
Wed	08:00	06:00	<u>State any seasonal variations for performing plays</u> (please read guidance note 4)		
Thur	08:00	06:00			
Fri	08:00	06:00	<u>Non standard timings. Where you intend to use the premises for the performance of plays at different times to those listed in the column on the left, please list</u> (please read guidance note 5)		
Sat	08:00	06:00			
Sun	08:00	06:00	That at the start of British Summertime the terminal hour for all licensable activities shall be extended by one hour.		
			That on New Year's Eve licensable activities shall also be permitted between the end of the hours permitted for licensable activities on New Year's Eve to the start of the hours permitted for licensable activities on New Year's Day.		

B

Films Standard days and timings (please read guidance note 6)			Will the exhibition of films take place indoors or outdoors or both – please tick (please read guidance note 2)	Indoors	<input type="checkbox"/>
				Outdoors	<input type="checkbox"/>
				Both	<input checked="" type="checkbox"/>
Day	Start	Finish	Please give further details here (please read guidance note 3)		
Mon	08:00	06:00			
Tue	08:00	06:00			
Wed	08:00	06:00	State any seasonal variations for the exhibition of films (please read guidance note 4)		
Thur	08:00	06:00			
Fri	08:00	06:00	Non standard timings. Where you intend to use the premises for the exhibition of films at different times to those listed in the column on the left, please list (please read guidance note 5)		
Sat	08:00	06:00	That at the start of British Summertime the terminal hour for all licensable activities shall be extended by one hour.		
Sun	08:00	06:00	That on New Year's Eve licensable activities shall also be permitted between the end of the hours permitted for licensable activities on New Year's Eve to the start of the hours permitted for licensable activities on New Year's Day.		

C

Indoor sporting events Standard days and timings (please read guidance note 6)			<u>Please give further details</u> (please read guidance note 3)	
Day	Start	Finish		
Mon	08:00	06:00		
Tue	08:00	06:00		<u>State any seasonal variations for indoor sporting events</u> (please read guidance note 4)
Wed	08:00	06:00		
Thur	08:00	06:00		
Fri	08:00	06:00		<u>Non standard timings. Where you intend to use the premises for indoor sporting events at different times to those listed in the column on the left, please list</u> (please read guidance note 5)
Sat	08:00	06:00		
Sun	08:00	06:00		That at the start of British Summertime the terminal hour for all licensable activities shall be extended by one hour.
				That on New Year's Eve licensable activities shall also be permitted between the end of the hours permitted for licensable activities on New Year's Eve to the start of the hours permitted for licensable activities on New Year's Day.

D

Boxing or wrestling entertainments Standard days and timings (please read guidance note 6)			<u>Will the boxing or wrestling entertainment take place indoors or outdoors or both – please tick</u> (please read guidance note 2)	Indoors	<input type="checkbox"/>
Day	Start	Finish		Outdoors	<input type="checkbox"/>
Mon	08:00	06:00	<u>Please give further details here</u> (please read guidance note 3)	Both	<input checked="" type="checkbox"/>
Tue	08:00	06:00			
Wed	08:00	06:00		<u>State any seasonal variations for boxing or wrestling entertainment</u> (please read guidance note 4)	
Thur	08:00	06:00			
Fri	08:00	06:00		<u>Non standard timings. Where you intend to use the premises for boxing</u>	

			or wrestling entertainment at different times to those listed in the column on the left, please list (please read guidance note 5)
Sat	08:00	06:00	That at the start of British Summertime the terminal hour for all licensable activities shall be extended by one hour.
Sun	08:00	06:00	That on New Year's Eve licensable activities shall also be permitted between the end of the hours permitted for licensable activities on New Year's Eve to the start of the hours permitted for licensable activities on New Year's Day.

E

Live music Standard days and timings (please read guidance note 6)			Will the performance of live music take place indoors or outdoors or both – please tick (please read guidance note 2)	Indoors	<input type="checkbox"/>			
			Times in bold are for outdoors.	Outdoors	<input type="checkbox"/>			
				Both	<input checked="" type="checkbox"/>			
Day	Start	Finish						
Mon	08:00	06:00						
	09:00	22:30						
Tue	08:00	06:00						
	09:00	22:30						
Wed	08:00	06:00				State any seasonal variations for the performance of live music (please read guidance note 4)		
	09:00	22:30						
Thur	08:00	06:00						
	09:00	22:30						
Fri	08:00	06:00				Non standard timings. Where you intend to use the premises for the performance of live music at different times to those listed in the column on the left, please list (please read guidance note 5)		
	09:00	22:30						
Sat	08:00	06:00				That at the start of British Summertime the terminal hour for all licensable activities shall be extended by one hour.		
	09:00	22:30						
Sun	08:00	06:00	That on New Year's Eve licensable activities shall also be permitted between the end of the hours permitted for licensable activities on New Year's Eve to the start of the hours permitted for licensable activities on New Year's Day.					
	09:00	22:30						

F

Recorded music Standard days and timings (please read guidance note 6)			<u>Will the playing of recorded music take place indoors or outdoors or both – please tick</u> (please read guidance note 2) Times in bold are for outdoors.	Indoors	<input type="checkbox"/>
				Outdoors	<input type="checkbox"/>
Day	Start	Finish	Both <input checked="" type="checkbox"/>		
Mon	08:00	06:00	<u>Please give further details here</u> (please read guidance note 3)		
	09:00	22:30			
Tue	08:00	06:00			
	09:00	22:30			
Wed	08:00	06:00	<u>State any seasonal variations for the playing of recorded music</u> (please read guidance note 4)		
	09:00	22:30			
Thur	08:00	06:00			
	09:00	22:30			
Fri	08:00	06:00	<u>Non standard timings. Where you intend to use the premises for the playing of recorded music at different times to those listed in the column on the left, please list</u> (please read guidance note 5)		
	09:00	22:30			
Sat	08:00	06:00	That at the start of British Summertime the terminal hour for all licensable activities shall be extended by one hour.		
	09:00	22:30			
Sun	08:00	06:00	That on New Year's Eve licensable activities shall also be permitted between the end of the hours permitted for licensable activities on New Year's Eve to the start of the hours permitted for licensable activities on New Year's Day.		
	09:00	22:30			

G

Performances of dance Standard days and timings (please read guidance note 6)			<u>Will the performance of dance take place indoors or outdoors or both – please tick</u> (please read guidance note 2)	Indoors	<input type="checkbox"/>
				Outdoors	<input type="checkbox"/>
Day	Start	Finish	Both <input checked="" type="checkbox"/>		
Mon	08:00	06:00	<u>Please give further details here</u> (please read guidance note 3)		
Tue	08:00	06:00			
Wed	08:00	06:00	<u>State any seasonal variations for the performance of dance</u> (please read guidance note 4)		
Thur	08:00	06:00			

Fri	08:00	06:00	<p>Non standard timings. Where you intend to use the premises for the performance of dance at different times to those listed in the column on the left, please list (please read guidance note 5)</p> <p>That at the start of British Summertime the terminal hour for all licensable activities shall be extended by one hour.</p> <p>That on New Year's Eve licensable activities shall also be permitted between the end of the hours permitted for licensable activities on New Year's Eve to the start of the hours permitted for licensable activities on New Year's Day.</p>
Sat	08:00	06:00	
Sun	08:00	06:00	

H

<p>Anything of a similar description to that falling within (e), (f) or (g) Standard days and timings (please read guidance note 6)</p>			<p>Please give a description of the type of entertainment you will be providing</p>		
Day	Start	Finish	<p>Will this entertainment take place indoors or outdoors or both – please tick (please read guidance note 2)</p>	Indoors	<input type="checkbox"/>
Mon	08:00	06:00		Outdoors	<input type="checkbox"/>
				Both	<input checked="" type="checkbox"/>
Tue	08:00	06:00	<p>Please give further details here (please read guidance note 3)</p>		
Wed	08:00	06:00			
Thur	08:00	06:00	<p>State any seasonal variations for entertainment of a similar description to that falling within (e), (f) or (g) (please read guidance note 4)</p>		
Fri	08:00	06:00			
Sat	08:00	06:00	<p>Non standard timings. Where you intend to use the premises for the entertainment of a similar description to that falling within (e), (f) or (g) at different times to those listed in the column on the left, please list (please read guidance note 5)</p>		
Sun	08:00	06:00	<p>That at the start of British Summertime the terminal hour for all licensable activities shall be extended by one hour.</p> <p>That on New Year's Eve licensable activities shall also be permitted between the end of the hours permitted for licensable activities on New Year's Eve to the start of the hours permitted for licensable activities on New Year's Day.</p>		

I

Late night refreshment Standard days and timings (please read guidance note 6)			Will the provision of late night refreshment take place indoors or outdoors or both – please tick (please read guidance note 2)	Indoors	<input type="checkbox"/>
				Outdoors	<input type="checkbox"/>
				Both	<input checked="" type="checkbox"/>
Day	Start	Finish	Please give further details here (please read guidance note 3)		
Mon	23:00	05:00			
Tue	23:00	05:00	State any seasonal variations for the provision of late night refreshment (please read guidance note 4)		
Wed	23:00	05:00			
Thur	23:00	05:00	Non standard timings. Where you intend to use the premises for the provision of late night refreshment at different times, to those listed in the column on the left, please list (please read guidance note 5)		
Fri	23:00	05:00			
Sat	23:00	05:00	That at the start of British Summertime the terminal hour for all licensable activities shall be extended by one hour.		
Sun	23:00	05:00			
			That on New Year's Eve licensable activities shall also be permitted between the end of the hours permitted for licensable activities on New Year's Eve to the start of the hours permitted for licensable activities on New Year's Day.		

J

Supply of alcohol Standard days and timings (please read guidance note 6)			Will the supply of alcohol be for consumption – please tick (please read guidance note 7)	On the premises	<input type="checkbox"/>
				Off the premises	<input type="checkbox"/>
				Both	<input checked="" type="checkbox"/>
Day	Start	Finish	State any seasonal variations for the supply of alcohol (please read guidance note 4)		
Mon	08:00	06:00			
Tue	08:00	06:00	Non standard timings. Where you intend to use the premises for the supply of alcohol at different times to those listed in the column on the left, please list (please read guidance note 5)		
Wed	08:00	06:00			
Thur	08:00	06:00			
Fri	08:00	06:00			

			That at the start of British Summertime the terminal hour for all licensable activities shall be extended by one hour.
Sat	08:00	06:00	
			That on New Year's Eve licensable activities shall also be permitted between the end of the hours permitted for licensable activities on New Year's Eve to the start of the hours permitted for licensable activities on New Year's Day.
Sun	08:00	06:00	

State the name and details of the individual whom you wish to specify on the licence as designated premises supervisor:

Name Simeon Aldred	
Date of Birth ■■■■	
Address ■■■■■ ■■■■■	
Postcode	■■■■■
Personal licence number (if known) ■■■■■	
Issuing licensing authority (if known) Broxtowe Borough Council	

K

<p>Please highlight any adult entertainment or services, activities, other entertainment or matters ancillary to the use of the premises that may give rise to concern in respect of children (please read guidance note 8).</p> <p>N/A</p>

L

Hours premises are open to the public Standard days and timings (please read guidance note 6)			State any seasonal variations (please read guidance note 4)
Day	Start	Finish	
Mon	08:00	06:00	<p>Non standard timings. Where you intend the premises to be open to the public at different times from those listed in the column on the left, please list (please read guidance note 5)</p> <p>That at the start of British Summertime the terminal hour for all licensable activities shall be extended by one hour.</p> <p>That on New Year's Eve licensable activities shall also be permitted between the end of the hours permitted for licensable activities on New Year's Eve to the start of the hours permitted for licensable activities on New Year's Day.</p>
Tue	08:00	06:00	
Wed	08:00	06:00	
Thur	08:00	06:00	
Fri	08:00	06:00	
Sat	08:00	06:00	
Sun	08:00	06:00	

M Describe the steps you intend to take to promote the four licensing objectives:

a) General – all four licensing objectives (b, c, d and e) (please read guidance note 9)

1. For all events, the premise licence holder shall have in place documentation for the venue that will be reviewed prior to each event and updated and amended if required. These documents will detail action to be taken by staff, will be available for inspection by the licensing authority and will include:

- Venue Operational Plan;
- Traffic Management Plan;
- Security/Crowd Management Plan;
- Noise Management Plan;
- Risk Assessment(s);
- Drugs Policy;
- Medical Management Plan;
- Youth and Vulnerable Persons Policy
- Any other associated documentation.
- A plan showing these temporary non-fixed structures will be created and circulated as part of the operational plan for each event.

b) The prevention of crime and disorder

2. That all staff will be given training in relation to the Licensing Act 2003 and the following specific areas; Licensing Act 2003 objectives and awareness, management systems and processes to enforce the premises licence conditions, Challenge 25 and the responsible retail of alcohol, warning and eviction (guidelines and procedures), conflict management and maintaining all required records and registers.

3. That the maximum capacity of the premises is 9,999 persons for all DJ / music led nights and 9,999 patrons for all day time events and exhibitions.

4. That clearly legible signage shall be prominently displayed where it can easily be seen and read by customers at all exits / entrances at the premises and in all external areas of the premises requesting to the effect that customers leave the premises in a quiet and orderly manner with respect for local residents.

5. That a register will be maintained at the main entrance to the premises showing the names, addresses and up to date contact details including mobile phone contact numbers for the Licensee and other members of the management team who are on duty

6. That no alcohol will be brought in to the premises by any customers at any time.

7. That any event held at the premises will be risk assessed and a suitable and sufficient number of male and female door supervisors will be employed at the premises in accordance with the risk assessment. A search policy will be implemented in line with the risk assessment.

8. The Venue Manager will only permit the sale of alcohol for consumption off the premises where the

alcohol is a specialist product, e.g. wine sold as part of a food and drink festival or a gift in part of a corporate event. For events which are promotional events, sealed bottles of alcohol may be part of a gift for people attending the event and customers will be allowed to leave with those sealed containers. This will be enforced by security confiscating open vessels on exit points.

9. The crowd management plan dealing with the dispersal and egress of guests will be in operation for every event held at the premise, details of this can be found in the operational plan.

10. That promotional literature and tickets will contain information regarding transport options and shall request that persons leave the area quietly.

11. That SIA security staff and/or stewards to be briefed to monitor and remind patrons where necessary to leave the site quietly

12. That any substantial queues formed within and outside the premises shall be supervised by event staff where appropriate. Such supervision shall be aimed at preventing disorder and discouraging anti-social behaviour.

13. All staff will receive licensing training in relation to the sale of alcohol, times and conditions of the premise prior to the premises opening. Training records will be kept on the premises.

14. That a comprehensive incident book / incident recording system shall be kept at the premises to record details of any of the following occurrences at the premises:

- Instances of anti-social or disorderly behaviour
- Violence
- Calls to the police or fire brigade
- Abuse of staff and / or customers
- Ejections of people from the premises
- Visits to the premises by the local authority, police or fire brigade
- Refused sales of alcohol
- Any malfunction in respect of the CCTV system
- Any other relevant incidents

15. The incident book / incident recording system shall record the time, date, location and description of each incident, the printed and signed name of the person reporting the incident and any action taken in respect of the incident. The incident book / incident recording system shall be available / be accessible at the premises at all times that the premises are in use in accordance with this licence and shall be made available to officers of the council, police or fire brigade on request.

16. That a written record is kept of all staff authorised to sell alcohol; this staff record is to contain the full name, home address, date of birth and national insurance number of each person so authorised. The staff record is to be kept on the licensed premises and made available for inspection by the Licensing Authority, Trading Standards or the Police as soon as reasonably practicable.

17. That SIA security staff and/or stewards to be briefed to monitor and remind patrons where necessary to leave the site quietly.

18. A digital CCTV system must be installed in the premises complying with the following criteria:

- Cameras must be sited to observe customer entrance and exit doors both inside and outside, the bars and floor areas.
- Where practical be capable of visually confirming the nature of the crime committed.
- Provide a linked record of the date, time and place of any image.
- Provide good quality images during opening times.
- Have the recording device located in a secure area or locked cabinet.
- Have a monitor to review images and recorded picture quality.
- Be regularly maintained to ensure continuous quality of image capture and retention.
- Have signage displayed in the customer area to advise that CCTV is in operation.
- Digital images must be kept for 31 days.
- The police and authorised officers of the council will have access to images upon request
- The equipment must have a suitable export method, e.g. CD/DVD writer so that the police or authorised officers of the council can make an evidential copy of the data when they require.
- All cameras shall record constantly during all hours the premises are open to the public or to a section of the public permitted access for corporate or private events.
- There must be a member of staff on site who can operate the CCTV when requested

19. That all information contained in the transport statement submitted to Enfield Council on application for this licence will be implemented by the premises licence holder. A copy of the transport statement shall be kept at the premises and be made available to council or police officers on request.

20. For any event that runs past an operational time of 4:00am a last entry policy will be in place stopping guests from entering the venue past 1:00am.

21. Licensable activities such as the sale of alcohol will cease one hour prior to the venue closing for events with a run-time to 6:00am, allowing a one-hour wind down unless agreed in advance with the responsible authorities.

e) Public safety

22. That for each event an event overview shall be prepared and be made available for inspection by the responsible authorities.
23. That unless otherwise agreed in writing with the Licensing Authority, details of any proposed use and storage of lasers, special effects, fireworks or pyrotechnics shall be reflected in the Venue Operational Plan
24. That a medical plan shall be devised in respect of the premises and a copy of the medical plan shall be available / be accessible at the premises at all times that the premises are in operation. The medical plan shall be made immediately available to council or police officers on request. First aid cover and facilities appropriate to any event must be provided in accordance with the medical plan.
25. That toilet facilities will be appropriately provided in accordance with each Venue Operational Plan, including the provision of external toilets if and when required.

d) The prevention of public nuisance

26. That a comprehensive Noise Management Plan shall be devised and reflected in the Venue Operation Plan in respect of the premises and a copy of the Noise Management Plan shall be accessible at the premises at all times that the premises are in operation. The Noise Management Plan shall be made immediately available to council or police officers on request. That the licensee will ensure that the premises Noise Management Plan is adhered to at all times.
27. That all relevant staff working at the premises shall be trained in the content of the Noise Management Plan and be aware of their responsibilities and duties under it. Records of relevant training shall be kept with the Noise Management Plan.
28. That the Noise Management Plan shall be reviewed whenever there is a significant change at the premises. For example, a significant change could include a new licensee, change to premises layout, a refit, a change to the type or style of licensed entertainment etc.
29. That a telephone number and/or email address should be made available on relevant websites for any noise complaints. Any noise complaints should be logged and investigated with written records of the details available to view by the Local Authority. Should any noise complaints be received, and if noise levels are above those specified in the licence conditions, action should be taken to reduce the levels at the noise source.
30. That in the event of an emergency, music will cease and safety announcements will be relayed to attendees to a suitable non-powered back-up system will be in place.
31. That patrons of the premises shall be provided with the details of preferred mini cab companies.
32. That permitted sound levels shall be specified in the contract conditions with hirers of the premises to ensure sound levels are maintained within the limits in order to reduce the risk of disturbance. Further, during a function in the premises, sample noise measurements shall be made by a designated person with an approved sound level meter to ensure that the levels are not being breached. Immediate action will be taken to reduce levels if this should arise.

e) The protection of children from harm

33. That a challenge 25 scheme shall be maintained at the premises requiring that staff selling alcohol request that any customer who looks under 25 years old, and who is attempting to purchase alcohol, provides valid photographic identification proving that the customer is at least 18 years old. Full details will be contained in the youth and vulnerable person policy.
34. Clearly legible signs shall be prominently displayed stating to the effect that a challenge 25 policy is in operation at the premises, that customers may be asked to provide proof of age and stating what the acceptable forms of proof of age are.
35. That suitable records are kept of all refused sales of age restricted products.
36. The operational procedure of all bars will adhere to the Venue Operational Plan
37. The Youth and Vulnerable persons policy agreed with the responsible authorities will be in operation at all events.

Checklist:

Please tick to indicate agreement

- I have made or enclosed payment of the fee.
- I have enclosed the plan of the premises.
- I have sent copies of this application and the plan to responsible authorities and others where applicable.
- I have enclosed the consent form completed by the individual I wish to be designated premises supervisor, if applicable.
- I understand that I must now advertise my application.
- I understand that if I do not comply with the above requirements my application will be rejected.
- [Applicable to all individual applicants, including those in a partnership which is not a limited liability partnership, but not companies or limited liability partnerships] I have included documents demonstrating my entitlement to work in the United Kingdom (please read note 15).

IT IS AN OFFENCE, UNDER SECTION 158 OF THE LICENSING ACT 2003, TO MAKE A FALSE STATEMENT IN OR IN CONNECTION WITH THIS APPLICATION. THOSE WHO MAKE A FALSE STATEMENT MAY BE LIABLE ON SUMMARY CONVICTION TO A FINE OF ANY AMOUNT.

IT IS AN OFFENCE UNDER SECTION 24B OF THE IMMIGRATION ACT 1971 FOR A PERSON TO WORK WHEN THEY KNOW, OR HAVE REASONABLE CAUSE TO BELIEVE, THAT THEY ARE DISQUALIFIED FROM DOING SO BY REASON OF THEIR IMMIGRATION STATUS. THOSE WHO EMPLOY AN ADULT WITHOUT LEAVE OR WHO IS SUBJECT TO CONDITIONS AS TO EMPLOYMENT WILL BE LIABLE TO A CIVIL PENALTY UNDER SECTION 15 OF THE IMMIGRATION, ASYLUM AND NATIONALITY ACT 2006 AND PURSUANT TO SECTION 21 OF THE SAME ACT, WILL BE COMMITTING AN OFFENCE WHERE THEY DO SO IN THE KNOWLEDGE, OR WITH REASONABLE CAUSE TO BELIEVE, THAT THE EMPLOYEE IS DISQUALIFIED.

Part 4 – Signatures (please read guidance note 10)

Signature of applicant or applicant's solicitor or other duly authorised agent (see guidance note 11). If signing on behalf of the applicant, please state in what capacity.

Declaration	<ul style="list-style-type: none"> • [Applicable to individual applicants only, including those in a partnership which is not a limited liability partnership] I understand I am not entitled to be issued with a licence if I do not have the entitlement to live and work in the UK (or if I am subject to a condition preventing me from doing work relating to the carrying on of a licensable activity) and that my licence will become invalid if I cease to be entitled to live and work in the UK (please read guidance note 15) • The DPS named in this application form is entitled to work in the UK (and is not subject to conditions preventing him or her from doing work relating to a licensable activity) and I have seen a copy of his or her proof of entitlement to work, if appropriate (please see note 15)
Signature	Woods Whur
Date	15 th March 2019.
Capacity	Woods Whur 2014 Limited - Solicitors for the Applicant

For joint applications, signature of 2nd applicant or 2nd applicant's solicitor or other authorised agent (please read guidance note 12). If signing on behalf of the applicant, please state in what capacity.

Signature	
Date	
Capacity	

Contact name (where not previously given) and postal address for correspondence associated with this application (please read guidance note 13)			
Paddy Whur Woods Whur 2014 Limited Devonshire House 38 York Place			
Post town	Leeds	Postcode	LS1 2ED
Telephone number (if any)	0113 234 3055		
If you would prefer us to correspond with you by e-mail, your e-mail address (optional) carole@woodswhur.co.uk			

July 2019 - June 2020

July 2019							August 2019							September 2019							October 2019												
No.	S	M	T	W	T	F	S	No.	S	M	T	W	T	F	S	No.	S	M	T	W	T	F	S	No.	S	M	T	W	T	F	S		
27		1	2	3	4	5	6	31					1	2	3	36	1	2	3	4	5	6	7	40					1	2	3	4	5
28	7	8	9	10	11	12	13	32	4	5	6	7	8	9	10	37	8	9	10	11	12	13	14	41	6	7	8	9	10	11	12		
29	14	15	16	17	18	19	20	33	11	12	13	14	15	16	17	38	15	16	17	18	19	20	21	42	13	14	15	16	17	18	19		
30	21	22	23	24	25	26	27	34	18	19	20	21	22	23	24	39	22	23	24	25	26	27	28	43	20	21	22	23	24	25	26		
31	28	29	30	31				35	25	26	27	28	29	30	31	40	29	30						44	27	28	29	30	31				

November 2019							December 2019							January 2020							February 2020											
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44					1	2		49	1	2	3	4	5	6	7	1								5								
45	3	4	5	6	7	8	9	50	8	9	10	11	12	13	14	2	5	6	7	8	9	10	11	6	2	3	4	5	6	7	8	
46	10	11	12	13	14	15	16	51	15	16	17	18	19	20	21	3	12	13	14	15	16	17	18	7	9	10	11	12	13	14	15	
47	17	18	19	20	21	22	23	52	22	23	24	25	26	27	28	4	19	20	21	22	23	24	25	8	16	17	18	19	20	21	22	
48	24	25	26	27	28	29	30	1	29	30	31					5	26	27	28	29	30	31		9	23	24	25	26	27	28	29	

March 2020							April 2020							May 2020							June 2020													
No.	S	M	T	W	T	F	S	No.	S	M	T	W	T	F	S	No.	S	M	T	W	T	F	S	No.	S	M	T	W	T	F	S			
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14	29	30	31					18	26	27	28	29	30			22	24	25	26	27	28	29	30	27	28	29	30				
																23	31														

CalendarVIP.com

Key:

Football Season (including Rugby)	
Music (and other Events)	
NFL	

TO DARE IS TO DO

Ms Josleen Ray
Principal Planning Officer (Strategic Projects)
Development Management
Regeneration & Environment Department
Enfield Council
Silver Street
EN1 3XE

18 April 2019

**By email**

Dear Ms Ray

**Application by Broadwick Ventures Limited Ref: 19/00632/FUL
Meridian Works, Units 4, 5, 6, 9 And 9A And Adjacent Land At Orbital Business Park 5 Argon Road
Edmonton N18 3BW**

This letter comprises representations by Tottenham Hotspur Football & Athletic Co. Ltd. ("the Club") in respect of the above planning application. The Club has separately made representations (via its licensing solicitors, Blandy & Blandy) in respect of three related licence applications and will be appearing at the forthcoming Hearing on 8 May 2019.

The Club notes that whereas the licence applications relate to repeated use of the application site, the planning application relates specifically to the Field Day 2019 music festival on 7-9 June 2019. These representations are differentiated accordingly.

Context of Representations

The Club has recently opened the Tottenham Hotspur Stadium – the centrepiece and second phase of a £1bn Northumberland Development Project ("NDP") investment in north Tottenham on the site it has occupied since 1899.

The new stadium is only 1.5km from the application site.

In addition to the new stadium, the Club has already completed a 7,500m² Sainsbury's store and the London Academy of Excellence Tottenham (an academically selective 16-19 free school sponsored by the Club and leading independent schools including Highgate School).

The Club has so far created over 2,500 jobs (FTE) through its investment in north Tottenham and will shortly be commencing the third phase of NDP comprising a 180 bed hotel; extreme/urban sports hub; 585 homes; community health facility; and 3,500m² of commercial/community space.

The NDP benefits from a site-specific allocation (NT7) in the adopted Tottenham Area Action Plan and is also the catalyst for the regeneration of the adjoining NT3 (Northumberland Park North); NT4 (Northumberland Park); and NT5 (High Road West), upon which rests the cumulative delivery of approximately 4,200 new homes; 10,200m² of commercial/industrial uses; 21,100m² of town centre uses. The new stadium is therefore inextricably linked with the regeneration of the area around it, which still includes one of the most deprived Wards in London (Northumberland Park).

The 62,000 seat new stadium has been designed primarily as the Club's new home, but also as a multi-use venue in order to bring year round activity and inward investment to the area. The TAAP states at 2.37:

"In North Tottenham, there is a need to realise the investment being made by Tottenham Hotspur FC on their stadium site as a catalyst for wider change, ensuring this area becomes a hub of activity throughout the week and not just on matchdays. This can be achieved by establishing the location as a premier leisure destination for London..."

The stadium therefore benefits from a planning permission and premises licence that allows for unlimited football matches; up to six concerts; and up to ten non-concert major events (a major event being 10,000 spectators or more for the purposes of the stadium planning permission).

The Club is a founding and ever-present member of the English Premier League since its formation in 1992/93. The Premier League is currently broadcast to 4.7bn people across 212 territories and the Club's presence therefore provides the wider area of Tottenham with a truly global profile and showcase for inward investment.

The Club's progress this season to the semi-final stages of the UEFA Champion's League will mean that on 30 April, the new stadium will host one of the highest profile club football matches ever staged in London.

Television broadcast and competition requirements are now such that the Club may be playing competitive first team fixtures on any of the seven days during a week throughout the domestic season (typically from the second week in August through to the second week in May the following calendar year). This excludes the pre-season warm-up games that normally take place in the last couple of weeks of July.

The Club also holds a ten-year contract with the NFL to stage a minimum of two NFL regular season American football games each year. On 17 April (yesterday), the Club and the NFL announced the first two games at the new stadium: Chicago Bears at Oakland Raiders on Sunday 6 October and Carolina Panthers at Tampa Bay Buccaneers a week later on Sunday 13 October.

Furthermore, the Club is also currently contracted to host a number of concerts and other non-concert major events from 23 May to 27 June 2020. By virtue of the stadium planning permission and premises licence and subject to the granting of an annual safety certificate, the Club is therefore at liberty to host all of these events and indeed will be doing so with full planning policy support.

Nevertheless, as a nearby regeneration area that will both benefit from and underpin the Club's investment in north Tottenham, the Club supports Meridian Water in principle and Enfield Council's efforts to attract new investment to the area. The Club also recognises that meanwhile uses can be an effective means of raising the profile of an area ahead of permanent redevelopment.

Representations

The Club has been working with its local authority and transport partners (which include both Haringey Enfield Councils; Transport for London; Arriva Rail Limited; Abellio Greater Anglia; and the British Transport Police) to devise and then implement a stadium transport strategy that will allow the full capacity events at the new stadium to be staged on both weeknights and weekends.

That strategy has been successfully tested through two test events on 24 and 30 March and three subsequent, full capacity football matches on 3, 9 and 13 April 2019. The games on 3 and 9 April (Crystal Palace and Manchester City) were 19:45 and 20:00 kick-offs respectively. The Club and its transport partners now have a good understanding of the impact of forward and return traffic on the local area and the four stations during both weeknight and weekend scenarios.

The new stadium transport strategy is based upon extensive and validated travel demand forecasting and survey information over ten years. In addition to optimising the use of the four stations serving the new stadium (Seven Sisters, Tottenham Hale, White Hart Lane and Northumberland Park), the strategy utilises a range of additional Club-sponsored transport services such as shuttle buses to Tottenham Hale, Wood Green and Alexandra Palace stations; as well as a raft of mitigation measures, including extensive fan and background user travel demand management (in conjunction with TfL); strategic and local traffic diversions; extensive Major Event Day CPZ; and attraction and retention measures within the stadium itself.

Whilst the strategy makes full use of recently upgraded Victoria line; Piccadilly line; London Overground; Abellio Greater Anglia; and Great Northern services, there is only finite public transport capacity available. That capacity will not increase until redevelopment works at White Hart Lane and Tottenham Hale stations have been completed; new higher capacity rolling stock has been introduced on the London Overground line; and the West Anglia Mainline STAR project facilitates additional stopping services at Northumberland Park and Meridian Water stations.

It is abundantly clear that there is insufficient public transport capacity to facilitate an event with 25,000 patrons at the application site at the same time as a full bowl event is taking place at the new Tottenham Hotspur Stadium. Furthermore, that position will not change post the completion of all of the public transport improvements listed above.

As correctly stated in the Committee report, the Club does not currently have any major events (i.e. over 10,000 spectators) scheduled for the 7 to 9 June 2019 coinciding with the Field Day 2019 music festival.

However, even absent any major events at the new stadium, it is not clear from the application how the applicant can cater for 25,000 patrons – particularly in the return traffic given the proposed finishing times of the event. Specifically:

- Access to the platforms at Meridian Water station will need careful management to avoid overcrowding. There will need to be a queue location reservoir for the station which does not interfere with the onward route towards Tottenham Hale LUL station.
- The vast majority of the attendees will wish to travel southbound from Meridian Water station and westbound from Tottenham Hale station. The last scheduled southbound train from Meridian Water to London Liverpool Street leaves at 00.17 on Sunday morning. This is a Stansted Express service which is likely to be busy with background users. The last scheduled southbound train from Meridian Water to Stratford leaves at 22.56 on the Saturday evening. Abellio Greater Anglia will need to provide a large number of additional train services.
- Tottenham Hale LUL station is a 30 minute walk from the concert venue ignoring the time taken to egress the concert site itself. With a 22:30 finish, no attendees would reach Tottenham Hale before 23:00. The train frequency for the Saturday night event is 14 trains from 23:00 to midnight; 9 trains from midnight to 01:00; and then 6 trains per hour throughout the night, i.e.

night train services. The combined AGA and LUL train frequency towards Central London would need to increase from 35 services to some 60-65 services between 23:00 and 01:00.

- The ingress capacity at Tottenham Hale is restricted by the LUL construction site hoardings, the current temporary LUL station access and the station vertical circulation (an escalator and central stair). The platform access capacity is some 150 passengers per minute. On occasions this ingress capacity will be required for interchange from AGA trains towards the Victoria Line.
- The LUL train frequency will need considerable enhancement from 23:00 onwards. At 20 trains per hour only 450 passengers could board each train.

The Club therefore shares officers' concerns (Committee report paras. 9.21) that:

"...the strain on existing infrastructure, in particular on Tottenham Hale Underground Station, which is expected to be used by 60% of patrons to leave the area."

The Committee report concludes in respect of transport at 9.25 that:

"Overall, whilst there are details to be finalised and there remains some concern about the impact of the event on the local transport network, particularly at Tottenham Hale Station, this is balanced against the fact that this permission will relate to a single event, which is taking place over a relatively short time period and the extensive planning that has been undertaken to ensure that negative impacts are mitigated as far as possible."

In the absence of key timetabling/service information to confirm that sufficient public transport capacity exists and crucially, in the absence of express support from Transport for London; the British Transport Police; and the Metropolitan Police, the Club cannot share this conclusion and must therefore object to the application.

The Club would ordinarily wish to make representations in good time, but notes that despite being the operator of a 62,000 capacity stadium a mile away from the application site, was not originally notified of the application and did not become aware of it until the end of March. We trust therefore that Planning Committee will still give due consideration to these representations.

Yours faithfully



Richard Serra MRICS MRTP1
Head of Planning

Mr Vincent Lacovara – Head of Planning, Enfield Council
Mr Peter George – Programme Director (Meridian Water), Enfield Council

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