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**DRUMSHEDS 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

**WITNESS STATEMENT OF
MR RICHARD SERRA**

I, Richard Serra, MRICS MRTPI, of Lilywhite House, 782 High Road, Tottenham, London N17 0BX state as follows:

1. I am Head of Planning for Tottenham Hotspur Football & Athletic Co Ltd ("THFC"), a role which I have held since June 2015.
2. I make this witness statement in support of the relevant representation made by THFC against the issue of a new Premises Licence pursuant to the above licensing application ("Drumsheds' application"). As is clear from THFC's representation (of 12 April 2019), it identifies very serious concerns relating to all four Licensing Objectives – particularly if the Applicant ("Drumsheds") was permitted (albeit, perhaps inadvertently) by the Licensing Authority (through the issue of a new licence), to operate when existing licensed events (including large capacity football matches) will already be in operation at the nearby Tottenham Hotspur Stadium ("Stadium"). Whilst this statement does not deal with all aspects of THFC's representation of 12 April - instead focussing on the transport aspects as detailed below - THFC maintains its full objection to the issue of any licence to the Applicant, for the full reasons set out therein.
3. The formal application (LIC 2) issued by Broadwick Venues Limited/Drumsheds relates to a proposed daily licensed operation (for up to 10,000 people) from 08:00 to 06:00 (22

hours), at the Drumsheds – a venue in very close proximity to, and with shared public transport links with, the Stadium. Save for this basic information about its planned events/activities, the application lacks any detail and makes no attempt to explain how the proposed licensed operation could feasibly operate on Stadium Event days.

4. In recent weeks, the Applicant has provided THFC with a proposed “Events Calendar” which shows that major entertainment events (e.g. those involving capacities of over 7,500 people) are planned at Drumsheds during the Football Seasons during 2019/2020; 2020/2021 and 2021/2022. This Calendar again provides scant details (over and above the number of proposed events) and specifically fails to detail the days of the week that the Applicant is proposing that these events will take place.
5. THFC invited the Applicant’s representatives to a meeting at the Stadium on 10 June 2019 to encourage the Applicant to provide specific information about its intended licensed operation at Drumsheds, and particularly what days of the week the Applicant plans to hold large-scale events with reference to its Calendar. Following discussion, our understanding is that the intended operation is as follows:
 - a) Daytime Club Shows – with up to 10,000 people attending, and typically on Saturdays from 12.00 to 23:00 hrs.
 - b) Evening Club Shows – with up to 10,000 people attending and typically on Fridays/Saturdays from 17.00 to 04.00 hrs.
 - c) Live Shows with up to 7,500 people attending, typically on Thursdays and Fridays from 19.00 to 23.00 hrs.
 - d) Branding & Corporate – up to 2,000 attending and typically 7 days/week.
 - e) Filming – up to 100 attending and typically 7 days/week.
6. At the same meeting, I took the opportunity to explain to the Applicant’s representatives more detail about what Events are already licensed to take place at the Stadium. These Events will involve substantial audiences/spectators, as the Stadium’s maximum capacity (for football matches) is over 62,000. I explained in some detail about how Events are scheduled including the fact that scheduling is a “moveable feast” due to the following factors:

- The scheduling of THFC's fixtures normally takes place across a whole football season beginning with the publication of an initial fixture list mid-June, followed by periodic broadcast selections during the season, providing roughly 6 weeks' notice of fixture changes. The fixtures list is consequently not static but a constantly moving list as a typical football season progresses. A higher profile club such as THFC will normally be subject to a higher proportion of televised fixtures than other clubs.
- Fixtures were prone to changes at shorter notice for a variety of reasons including extended progression in Cup competitions.
- That as it stands, the Club could be playing football on any day of the week except Thursdays, but that there may even be matches on Thursdays, if the Club drops into the UEFA Europa League as well in the latter part of the season.
- That two NFL games have been confirmed and announced in October 2019 (6th and 13th) as part of a ten year contract to stage *a minimum* of two games per season. There may well be more than two NFL games per annum in future years.
- In addition, the Club has a number of concerts and other events scheduled from early 2020 onwards.
- That as a reminder, the Stadium's planning permission allows (in addition to football) up to six concerts and ten other non-concert major Events (inclusive of the NFL games);

I provided the above explanation to the Applicant's representatives due to the fact that as the public transport infrastructure (servicing those arriving at/leaving the Stadium) will already be fully utilised (at virtually full capacity) on Stadium Event days, it is not feasible for the same transport facilities to also accommodate extra people arriving for/leaving one of the proposed category (a) to (c) Drumsheds' events. I explain more about the transport implications below, and further a separate statement has been given by THFC's Transport adviser, Mr Tim Spencer, of Tim Spencer & Co. The latter provides specialist transport planning, design and development services.

THFC Premises Licence and Stadium Transport Strategy

7. The Stadium is fully licensed to hold Events involving licensable activities under the terms of a Premises Licence granted last Summer, as well as, of course, being authorised to hold major outdoor sporting events (which are not licensable under the Licensing Act 2003) including football matches; NFL games and other sports (such as rugby).
8. In the run up to obtaining the various permissions/licences needed to operate the Stadium and indeed since that time, THFC has been working closely with Haringey Council, Enfield Council, Transport for London, Arriva Rail Limited, Abellio Greater Anglia, the Metropolitan Police, the British Transport Police and others, to create a Stadium Transport Strategy that will allow the full capacity crowd of up to 62,000 spectators per Event at the Stadium, to be safely and successfully implemented.
9. The Stadium Transport Strategy is based upon extensive and validated travel demand forecasting and survey information collated over 10 years. It also utilises a raft of mitigation measures, extensive fan and background user travel demand management (in conjunction with TfL), strategic and local traffic diversions, extensive Major Event Day CPZ extensions and attraction and retention measures within the Stadium itself. In addition there are arrangements in place for Club-sponsored transport services such as shuttle buses to Tottenham Hale, Wood Green and Alexandra Palace stations to provide further support alongside the existing public transport infrastructure.
10. The strategy has now been successfully tested through two test events in March 2019 and subsequently at the football matches which have taken place since the Stadium became fully operational in April 2019. THFC and transport partners (identified in paragraph 8) now have a good understanding of the impact of forward and return traffic on the local area and the four local stations which are heavily relied upon for transportation during events held on weekdays and weekends. These stations are Seven Sisters, Tottenham Hale, White Hart Lane and Northumberland Park.
11. THFC's strategy has taken into consideration the full use of recently upgraded Victoria line, Piccadilly line, London Overground (Arriva), Abellio Greater Anglia and Great Northern services. The capacity that the local transport stations can accommodate will *not* increase until the redevelopment works at White Hart Lane and Tottenham Hale stations has been

completed together with the higher capacity rolling stock being introduced on the London Overground line and the West Anglia Mainline STAR project facilitates additional stopping services at Northumberland Park and Meridian Water stations. In any event, there are no further planned increases in the capacity of the Victoria line.

Drumsheds' proposed licensed operation and potential to harm public safety

12. I will leave it to Mr Tim Spencer to explain in detail why Drumsheds' proposed Category (a) to (c) operations (as detailed in paragraph 5 above, and noted in its Events Calendar) are not feasible on a Stadium Event day, but in simple terms this is due to the logistics around those arriving at and/or departing from the Stadium Event, using some of the public transport facilities which those attending/leaving Drumsheds would use (on a non-Stadium Event day).
13. As at the date of this statement, Drumsheds had produce three (almost identical) draft Transport Management Plans (produced by an organisation called CPA Events) to THFC and all three identify "nearest transport hubs (for its planned Drumsheds operation as) *Meridian Water Station...Northumberland Park Station and Tottenham Hale Station*" but two out of these stations would already be at near full capacity on Stadium Event days (depending on course on period of the sporting/entertainment event).
14. With the knowledge gained through the implementation of THFC's Strategy and as expanded on by Tim Spencer of Tim Spencer & Co in his separate statement, it is clear that when an Event Day is in progress at the Stadium (under the terms of its existing Licence), there would be insufficient public transport capability to accommodate any proposed Drumsheds' event with a capacity of over 2,000, unless there could be absolute certainty that those attending/leaving the Drumsheds event would not interfere with the "period of the Stadium's Event" as defined below. In practice, any occasions (when such certainty would be achievable) will be very limited due to the fact that (at least in terms of football matches) last minute changes can affect the timing/day of the fixture (with the consequent changes in when spectators will travel to and from the Stadium). This would still be the case even if all of the public transport improvements referred to in paragraph 11 above were completed.
15. Respectfully, it must follow from the above that it would 'fly in the face' of the promotion of all four Licensing Objectives for new Premises Licence now to be issued to Drumsheds,

which would result in the public transport system being seriously overloaded due to its planned activities (involving more than 2,000 people) interfering with the existing licensed (and indeed outdoor sports’) operation of the Stadium.

16. As mentioned above, it has to be appreciated that the Stadium Events Calendar is a ‘moveable feast’ due substantially to factors that are outside its control. For example, the broadcast selections are governed by the Premier League and the broadcasters themselves and are outside of the control of the Club. The same can be said regarding the scheduling of large scale music concerts – with dates being flexible for a considerable time until the promoter and THFC have reached final agreement.
17. Football matches often take place on different days of the week and at weekends during the football season and beyond the season, with the inclusion of ‘warm-up’ games often scheduled before the start of the season proper. This is evidenced by the matches that took place last year on Mondays, Tuesdays, Wednesdays, Saturdays and Sundays which can attract a capacity of up to 62,000. The forthcoming season imposes the possibility of matches also taking place on Thursdays if the Club is knocked out of the UEFA Champions League and participates in the Europa League. It should also be taken into account that Premier League matches can take place on Friday evenings, therefore resulting in the possibility of matches occurring every day of the week.
18. In terms of the “period of the Stadium Event” for transport use/crowds arriving and departing, typically for a football match, this will be from approximately 3 hours prior to the kick-off, until around 2 to 3 hours after the final whistle (depending on the day/time of the fixture)-, for return traffic. A table highlighting this Period (incorporating pre and post-match travelling of spectators based on the kick-off times of last season) has been provided below for reference:

Kick off (examples only)	Event Period (arriving and departing crowds)
12:30	09:30 – 17:30
13:30	10:30 – 18:30
15:00	12:00 – 20:00
16:30	13:30 – 21:30
17:30	14:30 – 22:30
19:45	16:45 – 00:15 (last trains)
20:00	17:00 – 00:15 (last trains)

19. In simple terms, it is consequently quite obvious from the above that if for example an evening match is taking place on Saturday night with kick-off at 20:00, the transport system in the locality would be heavily fully utilised in the period from about 17:00 onwards for a period of around three hours, by spectators arriving at the Ground. It follows from that that there would be no capacity on the shared public transport infrastructure to accommodate (for example) any Drumsheds Category (b) (Club Show - Evening) event, starting also at 17:00 hours.
20. Similarly, if there was a match on a Saturday starting at 15:00 hrs, spectators would be leaving post-match late afternoon and again there would not be capacity for those wanting to get to Drumsheds on public transport for an Evening Show. There could also be over-loading of the transport system in the same situation if Drumsheds wanted to have a "Live Show" Category (c) event.
21. The above are just two examples as to why it would be highly inappropriate for Drumsheds to be issued with a licence which could then result in serious clashes on public transport due to Drumsheds effectively ignoring a Stadium Event Day in operation.
22. The Stadium is a major investment – not only in the fabric of the building and the infrastructure around it, but in the community, providing hundreds of jobs to those in the locality. Like any other venue of this nature, it must operate (eventually) in a financially viable way. THFC consequently plans to use its Stadium to the maximum limits of its Premises Licence and planning permission which means that as well as having numerous football matches at the Stadium every year, it will be aiming to hold up to 16 major Events (in and out of the football season). Estimating 40 matches per annum and 16 other major Events – the Stadium could realistically be hosting 56 Stadium Event Days per year, many of which will fall on the days of the week on which Drumsheds' is now proposing it wishes to conduct licensable activities, without addressing how it could possibly so operate without serious jeopardising the Licensing Objectives.

Statement of truth

I believe that the facts stated in this witness statement are true.

A handwritten signature in black ink, appearing to read 'Richard Serra', written over a horizontal line.

Richard Serra

26 June 2019

EVENT
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The Drumsheds 2019/20

Show	Timing	Capacity (Total)
Club Shows (Daytime)	1200 - 2300	10,000
Club Shows (Evening)	1700 - 0400	10,000
Live Shows	1900 - 2300	7,500
Brand & Corporate	0800 - 2000	<2000
Filming	0800 - 2000	<100

- (a)
- (b)
- (c)
- (d)
- (e)

Apr-19 May-19 Jun-19 Jul-19 Aug-19 Sep-19 Oct-19 Nov-19 Dec-19 Jan-20 Feb-20 Mar-20

0	0	0	0	0	0	1	2	2	1	2	10	2	2	2	10
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
0	0	0	0	0	0	1	1	1	1	1	1	1	1	2	6
0	0	0	0	0	2	2	4	4	4	4	4	0	0	4	16
0	0	0	2	2	2	3	3	3	3	3	3	3	3	0	21
0	0	0	2	2	2	4	7	10	4	6	10	4	6	8	53

The Drumsheds 2020/21

Show	Timing	Capacity (Total)
Club Shows (Daytime)	1200 - 2300	10,000
Club Shows (Evening)	1700 - 0400	10,000
Live Shows	1900 - 2300	7,500
Brand & Corporate	0800 - 2000	<2000
Filming	0800 - 2000	<100

- (a)
- (b)
- (c)
- (d)
- (e)

Apr-20 May-20 Jun-20 Jul-20 Aug-20 Sep-20 Oct-20 Nov-20 Dec-20 Jan-21 Feb-21 Mar-21

2	2	0	0	0	1	2	2	2	1	2	2	2	2	2	16
0	0	0	0	0	0	1	1	1	0	0	1	0	0	1	4
1	1	1	0	0	2	2	2	2	1	2	2	1	2	2	16
0	0	0	0	0	2	2	2	4	4	4	4	0	0	4	16
0	0	0	3	3	3	3	3	3	3	3	3	3	3	0	24
3	3	1	3	3	8	10	12	12	5	7	12	5	7	9	76

The Drumsheds 2021/22

Show	Timing	Capacity (Total)
Club Shows (Daytime)	1200 - 2300	10,000
Club Shows (Evening)	1700 - 0400	10,000
Live Shows	1900 - 2300	7,500
Brand corporate	0800 - 2000	<2000
Filming	0800 - 2000	<100

- (a)
- (b)
- (c)
- (d)
- (e)

Apr-21 May-21 Jun-21 Jul-21 Aug-21 Sep-21 Oct-21 Nov-21 Dec-21 Jan-22 Feb-22 Mar-22

2	2	0	0	0	1	2	3	3	1	2	3	3	2	2	18
1	1	0	0	0	0	1	1	1	0	1	1	1	0	1	6
1	1	1	0	0	2	2	3	3	0	2	3	3	2	3	18
0	0	0	0	0	2	2	4	4	4	4	4	4	0	4	16
0	0	0	3	3	3	3	3	3	3	3	3	3	3	0	24
4	4	1	3	3	8	10	14	14	4	7	14	4	7	10	82