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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
TIM SPENCER

I, Tim Spencer of Tim Spencer & Co of Chancery House, 53 – 64 Chancery Lane, London WC2A 1QU will state as follows:

1. I am a transport planning consultant with a specialism in stadium development projects. My first project was in 1992 (Croke Park, Dublin) and I have worked on a continual basis ever since including on the following projects in date order – Stamford Bridge (Chelsea), Wembley (National) Stadium, Emirates Stadium (Arsenal), Aviva Stadium, Dublin, Allianz Park (Saracens) and Tottenham Hotspur Stadium (“the Stadium”). I’ve also undertaken specific transport planning studies for a least another dozen stadium owners. I’ve also worked on a large number of major music events in Ireland on behalf of a major promoter from 1995 to 2005 in terms of event planning and environmental monitoring studies.
2. I make this witness statement in support of the relevant representation made by Tottenham Hotspur Football Club & Athletic Co Ltd (“THFC”) on 12 April 2019 against the grant of the above licensing application by Broadwick Venues Ltd (“Drumsheds”) in relation to their planned daily ‘events’ use of their Drumsheds’ site at Meridian Water. There are very serious concerns (for the reasons set out below) relating to all four Licensing Objectives but particularly relating to the risk to public safety, if Drumsheds was to be permitted by the Licensing Authority (through the issue of a new licence), to operate when existing large-scaled licensed events (including football matches) will already be in operation at the Stadium.

3. I have read the statements of Mr Richard Serra, Head of Planning, THFC and of Mr Alex Thorpe, and agree with their comments concerning the “moving” Stadium Events calendar in terms of football fixtures, and other Event Days. With the development of the Stadium in 2019/2020, specifically with the introduction of music concerts; NFL Games and Rugby games, the Stadium Events calendar will become yet further complicated. This of course was always to be expected due to the nature of the new Stadium (a world-class, state of the art, sports and entertainment stadium).
4. In complete contrast to the enormous amount of planning work over a full decade concerning how the transport system would work safely and effectively on a Stadium Event day, the Applicant has made the current application seemingly giving virtually no consideration as to how people will travel to and from its proposed venue on Stadium Event days. Bearing in mind that the proposed Drumsheds “Premises” is in very close proximity to the already licensed and operating Stadium with train stations/lines in common (particularly Tottenham Hale; Northumberland Park; White Hart Lane and Seven Sisters), one would expect to see empirical evidence supporting the assertions in their TMP and addressing the Licensing Objectives (specifically the prevention of public nuisance and the promotion of public safety). The complete lack of such evidence from the Applicant demonstrates (to my mind) that their proposed licensed operation on Stadium Event days is not viable, being in complete contravention of the Licensing Objectives.

Background experience relating to THFC and the local Stadium area

5. I have longstanding experience relating to THFC and the Stadium locality, having been involved since 2003; I have therefore assisted with the project development for 16 years. I have supported each and every planning application – which number dozens. I have attended every Event at the Stadium to date in a professional capacity. My responsibilities have included strategic transport planning, public transport service planning, travel demand forecasting and environmental assessment studies.
6. In the last 18 months I have had a particular responsibility for THFC fixture planning – to minimise the risk of any ‘clashes’ between THFC fixtures and other Stadium Events and major rail engineering works and consequential track and depot access blockades. All the fixtures at the Stadium have been planned at very short notice. To date, from my perspective, every Event at the Stadium has been successful with no major incidents or impediments affecting travel to and from the matches.

7. During the 2018/2019 football season, the consequence of the Premier League TV picks process (taking full account of club commitments for other competitions e.g. UEFA Champions League games), is that nationally Premier League games were scheduled for any (and every) day of the week. Indeed, there were 22 different combinations of day of week/times for kick-off. Late evening games were scheduled for every day except Sunday. It is consequently impossible to predict with absolutely certainly far in advance, whether a match is initially scheduled (for example) for a 15:00 Saturday kick-off, will actually take place either on that day of the week or at that starting time. At THFC many more than half of the games were re-scheduled at quite short notice. Occasionally, Premier League games are re-scheduled at even shorter notice perhaps because of the progress of an opponent in another competition.
8. There are not only the complexities around the 'moving' fixture list but also around the 'moving' diary of rail engineering works relating to the transport system. There are several dimensions to the rail engineering interface management, and these can all impact on when matches will actually be played at the Stadium.
9. Firstly, there is long-term planning undertaken between April and June each year to allocate fixtures to preferred weekends in the following season and to plan rail engineering works around those dates. Secondly, to plan specific fixtures when the exact date/time is known for Premier League fixtures – generally 5-8 weeks in advance following the monthly TV Pick process. Thirdly, to seek concessions from Network Rail to avoid any time constraints to rail operations. Fourthly, to do the same for European and domestic Cup fixtures when the notice period that THFC/Stadium receive, might be less than 4 weeks. Finally, we have to work with Network Rail and the train operators (Abellio and Arriva) to prepare unique train timetables for major Events at the Stadium. In 2019, these timetables have all been expedited through the complex approval process often with only a few days' notice (to spectators) for the finalised train services.
10. The special train timetables for THFC Events have particular features which are explained in more detail in Appendix 1 to this statement. In the same Appendix I go on to detail some of the additional complexities around the implications arising from engineering works/programming. At the back of the same Appendix is a "Simple Summary" which shows a 'snap-shot' of how complicated the programming of the Stadium Events around the

Railway Engineering is; this 'conflict' analysis is a 'moveable feast' – hence the difficulty in providing certainty regarding match days far in advance.

11. In the 2018/19 season, the net effect of all of the aforementioned and considerable planning work was that conflicts between Stadium Events and engineering works were avoided but the consequence of this was that there were railway engineering works scheduled for almost every single weekend when THFC did not have a match.

THFC Travel Patterns relating to licensed Events

12. I have attended all 10 of the Events at the new Stadium in a professional capacity. I have observed the arrival and departures circumstances at all relevant locations.
13. THFC have conducted 'Customer Experience' surveys of all 10 events. This survey includes questions about travel mode, station use, time of travel and explores the activities of supporters before and after games at the new Stadium. I conducted similar research for the previous (36,300 capacity) stadium from 2008 until 2016.
14. To date I have accumulated some 6,000 completed questionnaires. Since the first Premier League game, against Crystal Palace on Tuesday 3rd April 2019, the travel patterns have been studied on a game-by-game basis. The survey and analysis is completed within 3-4 days such that the information is readily available to assist with the detailed planning of the following match.
15. The Stadium's attendance is always less than the maximum capacity of 62,062 as a result of seats lost due to away supporter segregation and non-attendance by a small proportion of ticket-holders. In the following list I have applied my observations, by percentages, to a typical stadium occupancy of 60,500 supporters.
16. The key findings for departing trips from the Stadium for a typical THFC fixture are as follows;
 - Car travel – drivers and passengers – 20% (12,100 trips)
 - Taxi trips – 3% (1,815 passengers)

- Coach travel – 2.5% (1,513 trips)
 - Walk/Cycle – 3.5% (2,118 trips)
 - Public Transport trips – 71% (42,955 trips), of which;
 - LUL Victoria Line – 34% (20,570 trips)
 - National Rail (London Overground and Greater Anglia) - 39.5% (23,898 trips)
 - Bus travel (including THFC Shuttle Bus services – 8.5% (5,143 trips)
17. There is a double counting for public transport trips because some supporters use two modes in the Tottenham area e.g. bus and rail trips to reach the Victoria line service.
18. The above results apply to a THFC fixture with a London opponent – which is the most relevant comparison to the proposed large-scale Drumsheds’ (category (a) to (c)) events which are expected to draw an audience from Greater London. As will be noted however the aforementioned results are quite different from the travel demand forecasts suggested by the Applicants for a Drumsheds’ events with similar transport services in a nearby location.
19. The typical flows (of spectators) through each of the stations departing after a game are as follows;
- White Hart Lane London Overground (Arriva) station – 20% (12,100 trips)
 - Northumberland Park Greater Anglia (Abellio) station – 17% (10,285 trips)
 - Seven Sisters LUL station – 25% (15,125 trips)
 - Tottenham Hale LUL station – 9% (5,445 trips)
20. There are much smaller passenger flows through a number of other tube and rail stations in the Tottenham area.
21. The split for passengers leaving the Tottenham area by tube/rail towards Central London is 65% Victoria line and 35% National Rail (mostly to London Liverpool Street).
22. In broad terms 65-75% of supporters directly leave the Tottenham area after a match (the main peak egress period) and the remainder are retained for at least 1 hour both in the Stadium and at other local area outlets – with the main variable being the day of the week and the time of the final whistle. More supporters are retained in the local area later at

weekends.

23. The key capacity issues during the main egress are as follows;

- There are significant queues at White Hart Lane station particularly for travel into Central London for at least one hour;
- There are significant queues at Northumberland Park station particularly for travel into Central London for around one hour;
- Access to Seven Sisters station runs close to capacity for around 90 minutes;
- Access to Tottenham Hale is busy for around 1 hour at a level just below the threshold when queues would form due to the capacity of the station facilities e.g. the main escalator down to the platform level;
- Many Victoria line trains into Central London are full on departure from Seven Sisters station;
- The London Overground trains southbound from White Hart Lane are invariably full upon departure in the hour after the final whistle;
- The Greater Anglia trains southbound from Northumberland Park are typically 75-80% full on departure – some higher some lower depending on the time available to load the platforms between services;
- The northbound services from White Hart Lane and Northumberland Park can be very busy if the service goes to an attractive destination e.g. Enfield Town, Broxbourne, Harlow Town or Hertford East.

24. Before a match, spectators tend to arrive in the Stadium area on a constant basis for at least 3 hours before advertised 'kick off'. On the weeknight all the trains arriving at Seven Sisters, White Hart Lane and Northumberland Park stations are full upon arrival. At weekends on a Saturday the train services are similarly busy, at lower frequencies, and it is only on a Sunday afternoon when there is some spare train travel capacity but only because the background flows (of non-spectators), are much lower.

Drumsheds' proposed operation

25. In relation to Drumsheds' recent Field Day Festival transport planning, these Festival operations (in terms of transport management) are largely irrelevant as the Festival took place over a weekend when there was not an existing Stadium Event taking place. Further, the train services were facilitated by the re-scheduling of railway engineering works to the

previous weekends – a task which could *not* be done on a regular basis around Drumsheds' daily operations. For the sake of completeness I have however included my observations at Appendix 2.

26. My observations are relevant because the assumptions made in the three TMP documents that support the Drumsheds application are quite different to those set out in the Field Day TMP. I am of the opinion that the Field Day assumptions are more realistic. All four documents had the same author.
27. Whilst in my view the Field Day technical analysis (provided in its Field Day TMP) was inadequate (please see Appendix 2), I agree that the two main assumptions in the Field Day TMP, are correct – namely that i) the primary route for travel back into Central London will be the Victoria line rather than national rail services and ii) that the main means of access to the Victoria line will be by way of walking. These assumptions are consistent with the staging of major Events at the Tottenham Hotspur Stadium. The walk to the Victoria line from the Stadium is a very similar distance. The suggested level of use of Tottenham Hale station for Field Day access to the Victoria Line (circa. 7,500 people) is very similar to my recent experience for THFC games albeit that we have never dealt with an event finishing after 22:00 and the later finishing THFC Events have mainly been weeknight fixtures when the train service diminishes at a slower rate in the late evening than at weekends.
28. Drumsheds has recently disclosed an Events Calendar a copy of which is at Appendix 3. In addition, I have recently been provided with copies of three Transport Management Plans (TMP) for the proposed Drumsheds' events' licensing application. All three are basically the same document with minor editing. In my considered opinion, these documents are most certainly not 'fit for purpose' in any regard.
29. In simple terms Drumsheds are trying to rely on a transport infrastructure (including Meridian Water Station; Tottenham Hale and Northumberland Park) which will already be *fully utilised* by the Stadium spectators in the lead up to and following a Stadium Event.

30. The three Drumsheds' draft TMPs fail to recognise, or to take any account of, the fact that there are a number of detailed issues which determine the available train travel capacity by way of Meridian Water for a Drumsheds event, including the following;

- Regular Abellio service diversions (by way of Seven Sisters station) away from West Anglia Main Line ("WAML") i.e. Meridian Water station is closed;
- Rail engineering works to the north that limit the operations with bus replacement services with much lower travel capacity;
- Depot access constraints that can affect the availability of trains for both Abellio and Arriva;
- Service diversions from London Liverpool Street and Stratford and vice versa;
- The specific mix of the train service e.g. Stansted Express trains have much lower capacity than standard commuter trains because of the very limited standing space;
- Background flows with the train services e.g. northbound Cambridge trains in the PM peak period cannot stop at Meridian Water because they are full of commuters.

31. There are then a range of supplementary issues that dictate the extent to which the train travel capacity can be accessed by way of any local railway station, including the following;

- The (time) headway between scheduled services which can be very variable and is often less than 3 minutes. This leaves very little time to access the platform before the next train arrives;
- The incidence of 'Station Control' which restricts platform access to assist the door closing before the train departure;
- The stair capacity to access the platforms (egress and ingress) from/to the elevated Meridian Water station concourse;
- The train capacity. Some 40% of the Abellio Greater Anglia trains will be Stansted Express trains that have a much lower passenger capacity;
- Uneven platform loading e.g. congestion that restricts the numbers of passengers that can safely wait for the next train;
- The external queue capacity to create a reservoir for passengers waiting to gain access to the station concourse (bridge).

32. I have undertaken detailed 'time and motion' studies to identify the usable train capacity at each of the four stations (referred to above), taking account of the above considerations, which serve the Tottenham Hotspur Stadium. In my opinion, having studied very similar circumstances, it would be very unwise to assume that any more than an average of 500 passengers would use each train serving Meridian Water within the event egress (station ingress) period. There will be occasions that higher capacity commuter-style trains will depart with less than 300 passengers.
33. There will also be occasions when passengers will not board the first train because it does not serve the desired destination i.e. the platforms will be blocked by waiting passengers and the trains will leave well below capacity e.g. passengers not wishing to travel to Stratford as opposed to London Liverpool Street.
34. Whereas, the Field Day TMP assumed that the main departure route would be the walk to Tottenham Hale station the three Drumsheds TMP documents identify Meridian Water as the public transport departure point.

35. My comments on Drumsheds draft TMP set out below are related to incorrect assumptions;
- The train timetables are not correct as there is no evidence to suggest that the same Abellio special services, as per the Field Day festival, would be available for a large-scale Drumsheds' event. Indeed, in my view it is *highly unlikely* that Network Rail and Abellio would be prepared to commit the same or even similar resources for an event with less than 10,000 attendees.
 - The usable train capacity, as discussed previously, will be an average of 500 passengers per train (assumed for the Field Day assessments) and *not* the 800-1,000 suggested. It would be *impossible* to achieve this train capacity utilisation.
 - The assumed mode share projections are thus *completely incorrect*. Substantial numbers of attendees will walk to Tottenham Hale to access the Victoria line services into Central London. Why would anyone wait for upwards of 1 hour at Meridian Water for the 5 minute rail journey to Tottenham Hale when they can walk there in 20 minutes?
 - The taxi assumption is *far too high* at 18%. The 2% car use assumption ignores thousands of parking spaces in the local area. Some 20% of THFC supporters travel to and from games in private cars.
36. In my view the TMP documents provided by Drumsheds' (as at the date of this statement) are wholly inadequate and fails to address (to any degree) the obvious very serious concern namely with a licensed Stadium Event Day in play; the close proximity of the Stadium to the Drumsheds site and consequently the shared public transport facilities, there is a serious risk of overloading on the public transport system.
37. The above is correct not least because the priority of the THFC spectators in terms of transport means that there would be very few services stopping at Meridian Water. The departing attendees would thus route via Tottenham Hale to access the Victoria line services in substantial numbers. This would result in congestion at the station and would not leave sufficient capacity for THFC supporters to then board the Victoria line trains at Seven Sisters station, the next stop – which would in turn mean that they would be prevented from entering the station at the High Road entrance to avoid congestion in the underground station. Alternatively the Drumsheds' attendees might attempt to board southbound Abellio trains at Northumberland Park which would cause platform serious congestion and result in unacceptable delays for THFC supporters.

Meeting with the Applicants' Representatives on 25th June 2019.

38. I met with the Applicant's Representatives on 25th June 2019. In the first part of the meeting, I explained in some detail the travel patterns for THFC games at the Stadium in terms of travel modes, travel times, stadium entry and exit time profiles and public transport capacity utilisation by THFC supporters.
39. We then considered a number of hypothetical Drumsheds events without being specific about the type of event to explore the potential for conflicts and possible mitigating measures. I made the following observations;
- Drumshed events on Saturday 26th and Sunday 27th October 2019 – It is highly probable that there will be no train services to Meridian Water station on both days. The Applicants' response was that they would walk or bus transfer attendees to Tottenham Hale LUL station. THFC have an away fixture that weekend. This strategy is at odds with the published TMPs.
 - Event on Saturday 9th November 2019 – THFC are at home that weekend and the fixture is very likely to happen on the same day but with no certainty about the kick-off time. The Applicants suggested they would change the nature of the Drumsheds event to minimise the risk of a conflict.
 - Event on Saturday 30th November 2019 - THFC are at home that weekend and the fixture is very likely to happen on the same day but with no certainty about the kick-off time. The applicants suggested they would change the nature of the Drumsheds event to minimise the risk of a conflict. Can this change be done at short notice?
 - Event on Saturday 14th December 2019 - THFC are away that weekend. No issues.
 - Event on Tuesday 31st December 2019 – No THFC fixture that night. No issues.
 - Event on Saturday 1st February 2020 – THFC are scheduled to play at home that weekend. The game against Manchester City is very likely to be selected for live broadcast and THFC have a strong preference for a Saturday game because of extensive rail engineering works on the Sunday.

- Events on Thursday 6th, Friday 7th and Saturday 8th February 2020 – THFC do not have a home fixture that weekend. It is probable that there will be rail engineering works on the Saturday that would require the closure of Meridian Water station.

40. The above preliminary discussion highlighted the complexity of dates when Drumsheds proposed licensed events would not conflict with the Stadium Events (already authorised under various licenses/permissions/consents/certificates).

41. The last point for me to consider is the level of Drumsheds attendance that might be considered to be 'non-material' in transport terms either before or after an event where there is timing conflict with a Stadium Event. It should be noted that large numbers of staff working at a Stadium Event are not released until after the Stadium is closed - which will always be at least 1 hour after the finish time of the Event. Traditionally, large numbers of THFC supporters remain in the Stadium area for long periods after a game. This trend has been accelerated because of the success of the post-match retention of supporters in the Stadium in large numbers and for extended periods, which was never the case with the old stadium.

42. In my opinion, given that I have witnessed many busy trains late after the game finished, it would be unwise (and would not be consistent with any of the Licensing Objectives as specified in the Licensing Act 2003) to permit more than 2,000 persons at any Drumsheds event with a timing conflict with Stadium Event – either before or after a Stadium Event.

Statement of truth

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

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Tim Spencer

28 June 2019

Appendix 1 – Relevant Public Transport Travel Capacity Considerations.

The special train timetables for THFC events have particular features which are set out in more detail below, together with some of the additional complexities around the implications arising from engineering works/programming:

- The additional train travel capacity is fully in place at least 3 hours before the kick-off;
- All trains operate in 8-car formation when the regular service might well be only a 4-car train;
- Arriva add train services by way of White Hart Lane;
- Abellio stop all trains possible at Northumberland Park, depending on the day/time of the match; add the occasional extra service and run virtually all services in 8-car formation;
- After the game the special timetables also operate for at least 3 hours or up until the service closure on the night – typically 2.5 hours as a minimum;
- For a 17:30 kick-off on a Saturday afternoon, that is the most common day/time for a live televised game, the special train services start at 14:30 and finish at around 22:30;
- When a special THFC train service is operating by way of Northumberland Park it is not possible to stop more than just a few trains at Meridian Water. These would be mainly on the 3rd Track (bi-directional service) which will commence in September 2019. The main constraint is generally the platform access availability at London Liverpool Street or the unacceptable risk of delays to services, in a particular the Stansted Express services which have absolute priority.

Extensive Engineering Works:

The incidence of rail engineering works is extensive and the detailed planning by Network Rail is very complex – as assisted by the train operators. There are many different forms of rail engineering works, including the following:

- Regular ('cyclic') track maintenance works i.e. every 5-6 weeks sometimes night-time works and sometimes weekend blockades. Each section of track has its own routine strategy;
- Major engineering works e.g. the WAML 3rd Track construction part of which involved the construction of Meridian Water station;
- These WAML works are substantially complete but there are still requirements for extensive track closures to allow the completion of the Tottenham Hale interchange project;
- Station works at London Liverpool Street and Stratford particularly in the summer of 2019;
- Works undertaken on an annual basis e.g. track works between Cheshunt and Cambridge which is traditionally concentrated in January each year;

- Major works that affect other train services e.g. at London King's Cross that divert passengers into the Greater Anglia network;
- The movement of engineering trains around the country to gain timely access to major work sites.

Appendix 2 – Contrary Field Day TMP Assumptions

1. I reviewed several versions of the 2019 Field Day Festival Traffic and Transport Management Plan (TMP) in some detail. The Final version was, however, only received by THFC advisors on the 6th June 2019 – just a day before the Festival.
2. On my review, in general terms, I am of the opinion that the TMP is 'Fit for Purpose' but I do have a number of observations and significant reservations due to errors and contradictions in the assumptions and technical analysis, including the following:
 - I note the event capacity has been reduced to 22,261;
 - The key 'Projected Transport Usage' assumptions use the same percentages by mode than previously, as then applied to the lower capacity;
 - I note that the audience will predominantly reside in Greater London and in my opinion the tube/rail assumptions look to be realistic;
 - There will be very limited demand to travel on the rail services from/to the north of London - hence the capacity to do so is wholly irrelevant;
 - The Victoria Line train service frequencies are incorrectly summarized but this is a minor error;
 - The Tottenham Hale LUL access capacity is correct but not all this capacity will be available to Field Day attendees – there are significant background flows even late at night;
 - The Greater Anglia station access capacity at Tottenham Hale, at 1,000 per 15 minutes, seems to be realistic but it is not an issue that is relevant to staging THFC games so I have not assessed this assumption previously;
 - The available train capacity at Tottenham Hale is irrelevant because only 20% of the National Rail demand is assumed to appear at Tottenham Hale which is a contradictory assumption;
 - The train schedules for Meridian Water are incorrect and do not reflect the published national rail timetables;
 - There is no justification for the assumed station access capacity of 750 passengers per 15 minutes. The calculation is a lot more complicated than a standard assumption;
 - In my opinion the assumed train travel capacity by way of Meridian Water at 500 per train is reasonable but train by train there will be significant variation. When trains are more frequent the use will decline because there is not sufficient time to load the platforms between services;
 - There is no account of the limited capacity Stansted Express trains which make up 40% of the services for both nights in the event egress period;
 - The analysis recognizes that the trains will be in 8-car formation but I have not seen this confirmed by Abellio;
 - I think it is extremely unlikely that 10% of attendees will travel by either taxi or cycle to the event. This is twice the level observed for games at the Tottenham Hotspur stadium. Hence, rail and tube travel could be higher than assumed;
 - For THFC games the level of access to southbound Abellio services by way of Tottenham Hale, as opposed to Northumberland Park, is minimal and considerable less than 20% of such travel;
 - For reason that I have already provided the analysis presented in Table 12 of the TMP is far too simplistic and very misleading;
 - The queues at Tottenham Hale i.e. what is referred to as 'remaining demand' in Table 13 TMP will be a significant underestimate because very few attendees will walk to Tottenham Hale to access Abellio trains to London Liverpool Street. Hence the queue to the Victoria Line will be much larger at peak egress times. The queue will also remain in place for a longer period than calculated.

**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

SUPPLEMENTAL WITNESS STATEMENT
OF
TIM SPENCER

I, Tim Spencer of Tim Spencer & Co of Chancery House, 53 – 64 Chancery Lane, London WC2A 1QU will further state as follows:

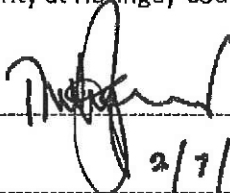
1. I make this statement (in addition to my statement of 26 June 2019) in response to further information recently provided by Drumsheds' relating to their proposed operation, following the meetings with THFC on 10 June (with Richard Serra) and with Richard (by telephone) and myself on 25 June; paragraphs 38 and 39 of my last statement refer.
2. As THFC had explained about the considerable complexities around the Stadium Event Day planning (due to the movability of the actual Events and also implications in relation to major rail engineering works), the Applicant's representatives confirmed that they would provide further information to support their proposed licensed operation, being cognisant of the fact that the Stadium's spectators/Events must not be negatively impacted by crowds wishing to attend events at their proposed venue.
3. The Applicant has now produced the attached Table and has confirmed their explanation as follows:
 - "The table plots the various fixture timings against our (Applicant's) proposed show times in order to highlight clashes.

- Rows with a **RED** cell are clashes we consider to be insurmountable and we would be willing to avoid these given appropriate notice. If a kick-off time changes prior to the event due to TV scheduling and becomes RED, we would only proceed if we could adjust our timings and transport offering in order to demonstrate to TFL & GA that any overlap would be workable.
 - Rows with an **ORANGE** cell are clashes that can be mitigated by adjusting our event timings and analysing event attendance projections against real-world data from prior events and fixtures. These are events that could only be scheduled if TFL & GA are comfortable that our plans would work around THFC's ingress/egress, which takes precedence.
 - Rows that are all **BLUE** avoid clashes, and can be scheduled without issue.
 - It is intended that this would be a dynamic document, and that the peak ingress / egress periods for both THFC and DS would be adjusted with any change in attendee behaviour - which may affect the clash scenarios."
4. The Table and comments expressed by the Applicant unfortunately only strengthen my view that their understanding of the complexities around the planning and implementation of Stadium Event's (involving upwards of 60,000 people); their understanding of how the public transport infrastructure is used on those Event Days and how the transport infrastructure must be periodically maintained and repaired around non-Stadium Event days are wholly unrealistic. The idea that the attached is sufficient (whether or not this is a "dynamic document (which could be) adjusted with any change of attendee behaviour" is (with respect) completely naïve and certainly gives me no confidence that, in relation to Drumsheds' proposed category (a) to (c) events (if permitted to take place on a Stadium Event Day), would not potentially catastrophically impact on the Licensing Objectives.
5. My lack of confidence in the Applicant's proposed use is based on the information set out in my original statement but in addition, the attached Table does not hold up to any sensible scrutiny as:
- The Applicant has not provided any credible, empirical information regarding the precise arrival and departure profiles for each of its event types. For example – the Table states that with a Drumsheds event (Cat A) for 10,000 people starting at 12 noon – people would start arriving from 12 noon when surely some would travel to the event ahead of that time;

- If there was ever to be a Sunday Drumsheds' event, there are additional kick-off times for Stadium matches that have been omitted from the Table;
 - The Table only considers the probability of a timing 'conflict' between arrivals and departures on a Stadium Event day, with its proposed use. There is a second dimension which needs to be properly considered. This is the 'conflict' between event times and railway engineering works, and the consequential transport services available on the day.
 - Whilst the primary consideration is the potential for conflicts between existing licensed events at the Stadium and the proposed Drumsheds' events, the Table fails to consider the many occasions when there is no Stadium Event but the operation of Drumsheds will still be compromised to varying degrees by there being no railway services to Meridian Water station.
 - The Table fails to take into account that Stadium Events will include numerous Events which are not football matches including music concerts; NFL games; rugby matches, and other entertainment events. Such events may have very different timings to the limited five "kick off" times included in the Table.
6. In addition the Applicant has not considered other large venues which also operate in the same area. For example, the home fixtures for THFC and Arsenal Football Club (AFC) are staged on generally alternate weekends. Hence, when THFC are at home, AFC are always scheduled to play away. The level of use of the Victoria line following an AFC game is also at capacity for long periods before and after a game with a level of use at a slightly lower level – typically 35% of all travel by THFC spectators and 30% of travel by AFC spectators. The two stadium capacities are very similar at 62,000 and 60,000 respectively. This is, therefore, another important and material consideration when planning the dates and times when category (a) to (c) events could feasibly be staged at Drumsheds, without seriously negatively impacting on the transport system.
7. For all of the reasons articulated in my original and this further statement, in my view it is highly improbable that the suggested numbers of annual Category (a) to (c) events (proposed by the Applicant in its Calendar) could be achieved without the Licensing Objectives being seriously compromised. There is a strong likelihood that if Drumsheds' activities (at Category (a) to (c) events) are permitted under a new Premises Licence, all four Licensing Objectives could be seriously compromised due to the infrastructure already being fully used for licensed Stadium Event Days.
8. Whilst it may be the case that on Stadium Event Days, the timing of the Event may be such that access to and from the Stadium by spectators/concert goers etc. may be "cleared" enabling a Drumsheds' category (a) to (c) event to take place safely, realistically, in my respectful opinion, that decision concerning whether (due to its

timings – including access and egress to) the Drumsheds' event was possible, ultimately can only safely be put in the hands of THFC, and the Responsible Authorities (including the Licensing Authority at Harlesey Council).

Signed

A handwritten signature in black ink, appearing to be 'M. J. ...', written over a dashed line.

Dated

2/7/19

DRUMSHEDS x THFC // INGRESS AND EGRESS

KEY	28/6/19 - V1
	DIRECT CLASH INGRESS / EGRESS
	DS TIMING ADJUSTMENT REQUIRED

CAT A EVENTS // DRUMSHEDS, 9,999 CAPACITY FINISHING AT 23.00

THFC KICK OFF TIME	THFC INGRESS PERIOD	DRUMSHEDS START TIME	DRUMSHEDS INGRESS PERIOD	THFC FINISH TIME	THFC EGRESS PERIOD	DRUMSHEDS FINISH TIME	DRUMSHEDS EGRESS PERIOD
12.30	09.30 – 13.00	12.00	12.00 – 17.00	14.15	14.00 – 17.15	23.00	22.30 – 00.00
15.00	12.00 – 15.30	12.00	12.00 – 17.00	16.45	16.30 – 19.45	23.00	22.30 – 00.00
17.30	14.30 – 18.00	12.00	12.00 – 17.00	19.15	19.00 – 22.15	23.00	22.30 – 00.00
19.45	16.45 - 20.15	12.00	12.00 – 17.00	21.30	21.15 – 00.30	23.00	22.30 – 00.00
20.00	17.00 – 20.30	12.00	12.00 – 17.00	20.45	21.30 – 00.45	23.00	22.30 – 00.00

CAT B EVENTS // DRUMSHEDS, 9,999 CAPACITY FINISHING AT 04.00

THFC KICK OFF TIME	THFC INGRESS PERIOD	DRUMSHEDS START TIME	DRUMSHEDS INGRESS PERIOD	THFC FINISH TIME	THFC EGRESS PERIOD	DRUMSHEDS FINISH TIME	DRUMSHEDS EGRESS PERIOD
12.30	09.30 – 13.00	17.00	17.00 – 21.00	14.15	14.00 – 17.15	04.00	03.30 – 05.00
15.00	12.00 – 15.30	17.00	17.00 – 21.00	16.45	16.30 – 19.45	04.00	03.30 – 05.00
17.30	14.30 – 18.00	17.00	17.00 – 21.00	19.15	19.00 – 22.15	04.00	03.30 – 05.00
19.45	16.45 - 20.15	17.00	17.00 – 21.00	21.30	21.15 – 00.30	04.00	03.30 – 05.00
20.00	17.00 – 20.30	17.00	17.00 – 21.00	20.45	21.30 – 00.45	04.00	03.30 – 05.00

CAT C EVENTS // DRUMSHEDS, 7,000 CAPACITY FINISHING AT 23.00

THFC KICK OFF TIME	THFC INGRESS PERIOD	DRUMSHEDS START TIME	DRUMSHEDS INGRESS PERIOD	THFC FINISH TIME	THFC EGRESS PERIOD	DRUMSHEDS FINISH TIME	DRUMSHEDS EGRESS PERIOD
12.30	09.30 – 13.00	19.00	19.00 – 21.00	14.15	14.00 – 17.15	23.00	22.30 – 00.00
15.00	12.00 – 15.30	19.00	19.00 – 21.00	16.45	16.30 – 19.45	23.00	22.30 – 00.00
17.30	14.30 – 18.00	19.00	19.00 – 21.00	19.15	19.00 – 22.15	23.00	22.30 – 00.00
19.45	16.45 - 20.15	19.00	19.00 – 21.00	21.30	21.15 – 00.30	23.00	22.30 – 00.00
20.00	17.00 – 20.30	19.00	19.00 – 21.00	20.45	21.30 – 00.45	23.00	22.30 – 00.00

Drumsheds Calendar (as edited by THFC include category of events)

The Drumsheds 2019/20

			Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20		
	Show	Timing			Capacity (Total)											
Cat a	Club Shows (Daytime)	1200 - 2300	10,000		0	0	0	0	0	1	2	2	1	2	2	10
Cat b	Club Shows (Evening)	1700 - 0400	10,000		0	0	0	0	0	0	0	0	0	0	0	0
Cat c	Live Shows	1900 - 2300	7,500		0	0	0	0	0	1	1	1	0	1	2	6
Cat d	Brand & Corproate	0800 - 2000	<2000		0	0	0	0	0	2	2	4	4	0	4	16
Cat e	Filming	0800 - 2000	<100		0	0	0	2	2	2	3	3	3	3	0	21
			0	0	0	2	2	4	7	10	10	4	6	8	53	

The Drumsheds 2020/21

			Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21			
	Show	Timing			Capacity (Total)												
Cat a	Club Shows (Daytime)	1200 - 2300	10,000		2	2	0	0	0	1	2	2	2	1	2	2	16
Cat b	Club Shows (Evening)	1700 - 0400	10,000		0	0	0	0	0	1	1	1	0	0	1	4	
Cat c	Live Shows	1900 - 2300	7,500		1	1	1	0	0	2	2	2	1	2	2	16	
Cat d	Brand & Corproate	0800 - 2000	<2000		0	0	0	0	0	2	2	4	0	0	4	16	
Cat e	Filming	0800 - 2000	<100		0	0	0	3	3	3	3	3	3	3	0	24	
			3	3	1	3	3	8	10	12	12	5	7	9	76		

The Drumsheds 2021/22

			Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22			
	Show	Timing			Capacity (Total)												
Cat b	Club Shows (Daytime)	1200 - 2300	10,000		2	2	0	0	0	1	2	3	3	1	2	2	18
Cat b	Club Shows (Evening)	1700 - 0400	10,000		1	1	0	0	0	1	1	1	0	0	1	6	
Cat c	Live Shows	1900 - 2300	7,500		1	1	1	0	0	2	2	3	3	0	2	3	18
Cat d	Brand corproate	0800 - 2000	<2000		0	0	0	0	0	2	2	4	4	0	0	4	16
Cat e	Filming	0800 - 2000	<100		0	0	0	3	3	3	3	3	3	3	0	24	
			4	4	1	3	3	8	10	14	14	4	7	10	82		