

Sue Dowling

From: Sue Dowling
Sent: 02 July 2019 15:09:09
To: paddy@woodswhur.co.uk
Cc: Peter.Loose@met.police.uk, Esther.Hughes@enfield.gov.uk
Subject: Drumsheds
Attachments: 73(a - e).pdf, Drumsheds Calendar edited by SED.THFC following Drumsheds comments.xlsx, image001.jpg, image002.jpg, image003.jpg

Please note that the offices of Blandy & Blandy LLP will be closed on Thursday 11th July.

This message is subject to the confidentiality notice at the end of this communication

Dear Paddy

Drumsheds' Events Premises Licence application

Draft Condition

I understand that at the recent meeting with my clients, your client's representatives confirmed that they are prepared to offer a 'veto' condition to support their application for a new Premises Licence.

We understand that this would essentially provide that where Category (a) to (c) events are proposed by your client (as per your client's calendar attached) to take place on a Stadium Event Day, they could only proceed and take place with the prior written permission of our client and the various Responsible Authorities (including Haringey Licensing Authority). Of course whether or not that permission is likely to be forthcoming will very much depend (inter alia) on the timings of the Stadium Event (including access/egress periods) and the proposed timing of Drumsheds' event (including likely access/egress of attendees).

Similarly our clients confirmed that they would have no problem with notifying your client if, for example, a fixture provisionally diarised for a particular date becomes "free" (and potentially available to your clients) due to the fixture being moved to another (Stadium Event) date.

As you will note from the below, this condition would not inhibit your client's licensable activities on a non-Stadium Event Day or on a Stadium Event Day if your client's event fell within category (e) or (f) (as per the attached), or was between 08:00 to 10:00 only.

As we have not as yet received any draft condition from your clients, to assist we set out a suggested draft condition below which your client may wish to adopt as part of its proposals to support its application. If they wish to do so, kindly confirm asap and we shall then take our client's further instructions regarding their Representation. In the meantime, we reserve our client's position fully as regards the full terms of its Representation of 12 April 2019.

Drumsheds: Draft Condition

(Prepared for consideration and strictly without prejudice to the THFC's full Representation against the grant of the Drumsheds' Events Licence application)

Reference to Drumsheds' Category (a) to (e) events is to the instances at which licensable activities may take place as defined in the Events Calendar attached to these conditions.

1. No licensable activities shall be authorised to take place under this Premises Licence on any **Stadium Event Day** unless:

- a) Admittance will be to a category (d) or (e) event involving under 2000 persons (including staff; performers and/or any third parties); or
 - b) Licensable activities will only be conducted (at any category of event) between 08:00 and 10:00; or
 - c) The Licensing Authorities for Enfield and for Haringey; the MPS; and Tottenham Hotspur Football & Athletic Co Ltd (THFC) have (prior to the proposed event) all confirmed in writing to the Premises Licence Holder (by email to its Nominated Representative*) that licensable activities are permitted to take place **and** written permission has not subsequently been rescinded in writing, due to the subsequent re-scheduling of a Stadium Event Day.
2. Compliance with condition 1(a) is subject to the following conditions:
- (a) Any information issued; promotion and/or any advertising of any nature (including, but not limited to, information provided through email; on any website; through Twitter and/or other forms of social media) relating to the proposed use of the Premises shall clearly provide that:
 - (i) The capacity of the Drumsheds' event (including staff; performers and any third parties) is strictly limited to 2,000; admission will be limited to ensure that this capacity is not exceeded; and
 - (ii) Those purchasing tickets/attending the Drumsheds' event should note that a major Stadium Event will be taking place on the same day and they are advised to carefully consider the impact of those travelling to/from that major Event, before deciding upon their own travel arrangements, and
 - (b) Once the capacity of 2,000 is reached, no further admittance will be permitted regardless of whether patrons leave Drumsheds' during the course of the event.

3. Condition 1(c) is subject to the following condition:

- (a) Any information issued; promotion and/or advertising of any nature (including, but not limited to, information provided through email; on any website; through Twitter and/or other forms of social media) relating to the proposed licensable use of Drumsheds shall clearly provide that those purchasing tickets/attending the Drumsheds' event should note that a major Stadium Event will be taking place on the same day and they are advised to carefully consider the impact of those travelling to/from that major Event, before deciding upon their own travel arrangements; and
- (b) The Premises Licence Holder will provide clear information (via its website; via its ticketing records and through social media) to those proposing to attend Drumsheds, at least 14 in advance of the proposed licensable activities, to remind them that a major Stadium Event will be taking place on the same day and they are advised to carefully consider the impact of those travelling to/from that major Event, before deciding upon their own travel arrangements.

"Stadium Event Day" means any day (being a period from 00:00 to 23:59) during which an Event will be taking place in the Stadium bowl at Tottenham Hotspur Stadium for which a General or Special Safety Certificate is required.

Informative:

Where THFC has provided written permission to the Premises Licence Holder (Nominated Representative) pursuant to condition 1(c) and the scheduling of a Stadium Event leads it to rescind its permission, THFC shall make efforts to notify the Premises Licence Holder's Nominated Representative of that rescission in a timely fashion.

Where a day was initially envisaged by THFC not to be a Stadium Event Day but becomes a Stadium Event Day (due to re-scheduling of football matches or other circumstances) **and** where the Premises Licence Holder's Nominated Representative has previously notified THFC (by email to THFC's nominated contact; copied to his/her deputy) that it proposes to hold a Category (a) to (c) event on that day; THFC will notify the Premises Licence Holder's Nominated Representative, of the Stadium Event Day timings, and will confirm whether or not written permission is provided under condition 1(c) above.

*To aid communication, THFC will provide the Premises Licence Holder with a nominated point of contact (and a deputy) at THFC, and with their email details, and the Premises Licence Holder shall confirm its Nominated Representative, and provide his/her contact details.

Supplementary Statement

Further, we now attach a slightly amended Index to THFC's bundle to insert Tim Spencer's Supplemental Statement a copy of which is also attached.

We have copied in the Police and the Council in view of the Supplementary Statement but also as the suggested condition may assist them in their considerations.

Best regards

Sue

Sue Dowling

Partner

Employment; Business Immigration; Venue Licensing

For and on behalf of Blandy & Blandy LLP

D: 0118 951 6822 | T: 0118 951 6927 | W: www.blandy.co.uk

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If you receive any communication purporting to come from anyone at Blandy & Blandy LLP asking for funds to be transferred to another account, please contact us at once (using a telephone number from our website, not from the communication you have received) and on no account send the funds requested.

We will not accept liability if you transfer the money to an incorrect bank account in these or similar circumstances.

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Blandy & Blandy LLP
One Friar Street

Note of meeting with Broadwick Events/Vibration Group on Monday. Key point underlined.

Time/Date: 2.00pm on 10 June 2019-06-12

Venue: THFC offices, Lilywhite House

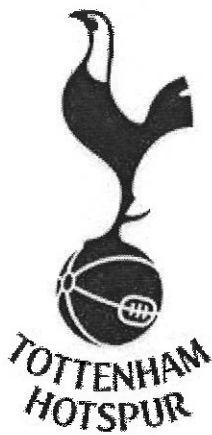
Present: Jon Drape – MD, Ground Control UK
Gareth Cooper – CEO, Broadwick Live
Bradley Thompson – MD, Broadwick Live
Simon Tracey – CEO, Vibration Group
Richard Serra – Head of Planning, THFC

1. JD provided brief recap – unfortunate beginning to relationship over Field Day licence. Strong desire to address that and be able to coexist with THFC. Regeneration of Meridian Water hopefully aligned with THFC's aspirations.
2. JD noted that Field Day had been relatively successful and that they had "picked up a few learnings on the ground." He noted that they had staged it alongside another major event of 50K in Manchester last weekend.
3. RS welcomed the sentiment and reiterated that the Club supports the regeneration of Meridian Water, but stressed that THFC has a number of events throughout the year in the stadium that it is contractually bound to deliver. Having staged 10 major events in the stadium, the Club also has a good understanding of arrival/departure patterns for events at different times and where any capacity might exist in the public transport network.
4. RS advised that the Club faced with an open-ended licence application for a wide range of events at any number of times, had to protect its position. If more clarity on how Drumsheds will operate can be provided, the Club could narrow down the potential periods of conflict.
5. RS set out how the scheduling of THFC's fixtures normally takes place across a 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. Fixtures were prone to changes at shorter notice for a variety of reasons including extended progression in cup competitions. RS noted that as it stands, the Club could be playing football on every day of the week except Thursdays. There may even be games on Thursday if the Club drops into the UEFA Europa League as well in the latter part of the season.

6. RS noted that two NFL games have been confirmed and announced in October 2019 (6 and 13) as part of a 10 year contract to stage a minimum of two games/season. There may well be more NFL games in future years. RS noted that the stadium planning permission (in addition to football) allows up to 6 concerts and 10 other non-concert major events, which include the NFL games. In addition, the Club has a number of concerts and other events scheduled from early 2020 onwards.
7. JD described the five types of events proposed to be staged at Drumsheds:
 - a. Daytime Club Shows – up to 10K and typically on Saturdays from 12.00pm to 11.00pm
 - b. Evening Club Shows – up to 10K and typically on Fridays/Saturdays from 5.00pm to 4.00am
 - c. Live Gigs – up to 7.5K and typically on Thursdays and Fridays
 - d. Branding & Corporate – up to 2K and typically 7 days/week
 - e. Filming – up to 100 and typically 7 days/week.
8. JD to provide RS with schedule of event types. [done]
9. RS noted that event type (e) should be of no concern to the Club. Subject to final review and appropriate messaging, event type (d) might also be compatible with major events taking place at the stadium. Event types (c) would be possible if THFC not staging football or other major events. There would however be clashes with event types (a) and (b) – particularly on the arrivals.
10. GC advised that in the event of a clash with a stadium event, they would simply have to cancel their event. RS advised that if enshrined as an appropriate condition, that would address the Club's operational concerns.

11. ST advised that Vibration Group had recently been speaking with NFL in respect of the Fan Experience for the October games.
12. Agreed that the parties would work through the potential areas of transport conflict with THFC's transport consultant and then seek to agree a set of licence conditions.
13. Agreed that JD would seek an adjournment of the licence hearing on 24 June to allow time for the parties to work through the event overlaps and draft conditions to address. Agreed that an additional month ought to be sufficient.
14. BT enquired about the availability of a box and advised that he was keen to make contact with THFC new business/partnership teams. RS to confirm premium availability and advise and suggested that he would be very happy to introduce colleagues once agreement had been reached on the Drumsheds licence.
15. RS provided brief tour of stadium.



Richard Serra MRICS MRTPI
Head of Planning

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**Tottenham Hotspur Football & Athletic
Co Ltd**

Lilywhite House, 782 High

Road, London, N17 0BX

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Facebook / Tottenham Hotspur

Sue Dowling

From: Sarah Griffiths [sarah@woodswhur.co.uk]
Sent: 11 June 2019 15:13:25
To: Sue Dowling
Cc: Paddy Whur
Subject: Field Day
Attachments: image001.jpg, Field Day Festival at Meridian Water Site, Enfield

Sent on behalf of Paddy Whur

Dear Sue

Please find attached an email I have today sent to the Authority asking for a short adjournment.

I understand our respective clients have met and are seeking to liaise over future traffic management plans and an event schedule at the Drumsheds which your client could live with.

We would hope in the circumstances that you would agree a short adjournment would assist these negotiations.

Kind regards

Paddy Whur

Woods Whur 2014 Limited
Tel: +44 (0)113 234 3055

paddy@woodswhur.co.uk

Woods Whur 2014 Limited, Devonshire House, 38 York Place, Leeds LS1 2ED.

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info@woodswhur.co.uk

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Sue Dowling

From: Paddy Whur [paddy@woodswhur.co.uk]
Sent: 06 June 2019 16:21:15
To: Sue Dowling
Subject: App M - Transport & Pedestrian Management Plan V8.0.pdf
Attachments: image001.jpg, App M - Transport & Pedestrian Management Plan V8.0.pdf

Hi Sue,

Please find attached.

Hopefully we can have a peaceful festival and look to reaching some agreement next week.

Paddy Whur
paddy@woodswhur.co.uk

Tel: +44(0)1132343055
M: 07738170137

Woods Whur,
Devonshire House, 38 York Place, Leeds, LS1 2ED



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(+ final TMP for
FIELD DAY.)

Sue Dowling

From: Paddy Whur [paddy@woodswhur.co.uk]
Sent: 06 June 2019 14:39:02
To: Sue Dowling
Cc: Peter.Loose@met.police.uk
Subject: RE: Field Day - copy TMP please
Attachments: image004.jpg, image005.jpg, image006.jpg, image007.jpg

Hi Sue,

Have gone to my client for the TMP and clarification on the points you have raised.

Paddy Whur
paddy@woodswhur.co.uk

Tel: +44(0)1132343055
M: 07738170137

Woods Whur,
Devonshire House, 38 York Place, Leeds, LS1 2ED



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Sue Dowling

From: Sue Dowling
Sent: 06 June 2019 14:33:06
To: paddy@woodswhur.co.uk
Cc: Peter.Loose@met.police.uk
Subject: Field Day - copy TMP please
Attachments: image001.jpg, image002.jpg, image003.jpg

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Dear Paddy

The Transport Management Plan (TMP) enclosed in the agenda papers for the Field Day Festival Hearing (version 7) was clearly in draft form only and we note that it is a licence condition of your client's Premises Licence that a final "comprehensive traffic management plan, including full details of ingress and egress management; parking restrictions and enforcement, taxi pick up and drop off positions" be provided in advance of the Festival. The finalisation of the TMP was also a matter that is covered by the SAG Report.

Can you email me across a copy of the final TMP for this weekend's festival as soon as possible?

Secondly – vis a vis the Events Calendar you have recently emailed to us – and strictly without prejudice to our client's Representation against the grant of your client's application for a daily Drumsheds licence - we note that the planned large capacity events (i.e. those involving upwards of 7,500 people) virtually all fall within the Football Season (when clearly matches will be being played at the Stadium) but your clients have not provided any details as to the days of the week on which they are proposing that their events take place. Is our assumption (that they are likely to take place primarily on a Saturday (or perhaps Friday) correct? To make any proper sense of the Calendar more detail is needed. For example, as your clients are proposing some 14 major events in November and December 21 – are these planned for every Saturday (and some Fridays) in November/December?

Regards

Sue

Sue Dowling

Partner

Employment; Business Immigration; Venue Licensing

For and on behalf of Blandy & Blandy LLP

D: 0118 951 6822 | T: 0118 951 6927 | W: www.blandy.co.uk

 Blandy & Blandy LLP  BlandyBlandyLLP

Sue Dowling

From: Paddy Whur [paddy@woodswhur.co.uk]
Sent: 04 June 2019 15:04:35
To: Sue Dowling, Emma Holmes
Subject: RE: (TOT9/11) Response?
Attachments: image001.jpg, image002.jpg, image003.jpg, image004.jpg, Drumsheds show types and caps v4.xlsx

Sue,

Please find the events calendar for the Drumsheds.

I will send three further emails with the traffic management plans for the three different capacity events. They are large attachments so please confirm receipt.

I know that Jon Drape from my client company has been liaising with the MPS over this who want to talk to us after the festival.

We are, of course, very happy to meet you and your clients to discuss too.

Paddy Whur
paddy@woodswhur.co.uk

Tel: +44(0)1132343055
M: 07738170137

Woods Whur,
Devonshire House, 38 York Place, Leeds, LS1 2ED



1 3 emails with
3 TMs.

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The Drumsheds 2019/20

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

The Drumsheds 2020/21

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

The Drumsheds 2021/22

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

Sue Dowling

From: Sue Dowling
Sent: 30 May 2019 11:11
To: paddy@woodswhur.co.uk; emma@woodswhur.co.uk
Subject: FW: (TOT9/11) Response?

This message is subject to the confidentiality notice at the end of this communication

Dear Paddy

I will be speaking to my clients today on this matter so it would be helpful if you could revert on the highlighted requests below.

Your client cannot expect our client to consider its application and to possibly review its comprehensive objections to it, unless and until it is capable of providing full details regarding **the scope** of its intended operation and specifics concerning how it will feasibly promote the licensing objectives, in the context of existing licensed premises already operating in the vicinity, including (but not limited to) Tottenham Hotspur Stadium.

Best regards Sue

Sue Dowling
Partner
Employment; Business Immigration; Venue Licensing
For and on behalf of Blandy & Blandy LLP
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From: Sue Dowling
Sent: 24 May 2019 11:47
To: paddy@woodswhur.co.uk
Cc: emma@woodswhur.co.uk
Subject: FW: (TOT9/11)

Dear Paddy

Thank you for your email. Certainly there does not seem much point in us speaking/emailing until you are in possession of your clients' full instructions although I am a little surprised that they are not available as yet! The

Hearing is just over a month away and it would be good this time around if your clients could avoid eleventh hour amendments.

We note that your clients are trying to move matters forward with the Police. The Police's objection of 11 April 2019 clearly covers some of the same serious concerns regarding the likely negative impact on the promotion of the Licensing Objectives, as articulated in our client's representation of 12 April – crucially (but not limited to) the potential for unacceptable congestion at limited public transport services, particularly if your clients operate their venue when a Stadium Event is taking place.

We see that the Police's objection refers to an email from your clients/your firm stipulating the planned use of the premises. Are the details set out in it (as recounted by the Police on page 3 of their objection) still accurate or have they been updated?

Can you kindly respond as to whether your clients have obtained any TMP which details how they propose that their currently unlicensed but planned operation of the Drumsheds could feasibly be safely conducted during a Stadium Event day (taking into account the necessary access/egress window before and after the Event)?

You are welcome to contact me in the week of 10 June although this seems rather 'late in the day' when, to date, we have seen nothing from the Applicant to suggest that it can safely operate its proposed licensing operation when Events (which are already licensed in the Stadium) will be taking place. Our clients therefore continue to maintain their full objection to this licensing application.

Kind regards
Sue

Sue Dowling
Partner
Employment; Business Immigration; Venue Licensing
For and on behalf of Blandy & Blandy LLP
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From: Emma Holmes [mailto:emma@woodswhur.co.uk]
Sent: 24 May 2019 10:58
To: Sue Dowling
Cc: Paddy Whur
Subject: Drumsheds/Events licence

Sent on behalf of Paddy Whur

Dear Sue,

Thank you for your email of the 23 May 2019.

Sue Dowling

From: Sue Dowling
Sent: 24 May 2019 11:46:45
To: paddy@woodswhur.co.uk
Cc: emma@woodswhur.co.uk
Subject: FW: (TOT9/11)
Attachments: image002.jpg, image003.jpg, image004.jpg, image005.jpg

Dear Paddy

Thank you for your email. Certainly there does not seem much point in us speaking/emailing until you are in possession of your clients' full instructions although I am a little surprised that they are not available as yet! The Hearing is just over a month away and it would be good this time around if your clients could avoid eleventh hour amendments.

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We see that the Police's objection refers to an email from your clients/your firm stipulating the planned use of the premises. Are the details set out in it (as recounted by the Police on page 3 of their objection) still accurate or have they been updated?

Can you kindly respond as to whether your clients have obtained any TMP which details how they propose that their currently unlicensed but planned operation of the Drumsheds could feasibly be safely conducted during a Stadium Event day (taking into account the necessary access/egress window before and after the Event)?

You are welcome to contact me in the week of 10 June although this seems rather 'late in the day' when, to date, we have seen nothing from the Applicant to suggest that it can safely operate its proposed licensing operation when Events (which are already licensed in the Stadium) will be taking place. Our clients therefore continue to maintain their full objection to this licensing application.

Kind regards
Sue

Sue Dowling

Partner

Employment; Business Immigration; Venue Licensing

For and on behalf of Blandy & Blandy LLP

D: 0118 951 6822 | T: 0118 951 6927 | W: www.blandy.co.uk

 Blandy & Blandy LLP  BlandyBlandyLLP

Sue Dowling

From: Emma Holmes [emma@woodswhur.co.uk]
Sent: 24 May 2019 10:57:39
To: Sue Dowling
Cc: Paddy Whur
Subject: Drumsheds/Events licence
Attachments: image001.jpg

Sent on behalf of Paddy Whur

Dear Sue,

Thank you for your email of the 23 May 2019.

Perhaps it would be a good idea for me to contact you again once I have my clients full instructions and we have moved matters forward with the police.

This will also give your clients the opportunity to get the Champions League final out of the way. Should I contact you again the week of the 10th June.

Regards,

Paddy

Woods Whur 2014 Limited
Tel: +44 (0)113 234 3055

emma@woodswhur.co.uk

Woods Whur 2014 Limited, Devonshire House, 38 York Place, Leeds LS1 2ED.

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Sue Dowling

From: Sue Dowling
Sent: 23 May 2019 11:36:10
To: 'Paddy Whur'
Subject: (TOT9/11)
Attachments: image002.jpg, image003.jpg, image004.jpg, image005.jpg

Dear Paddy

Thank you for your email.

Strictly without prejudice to our client's full representations against the "Events" application, I am sure that a call at some stage might be good but as mentioned to your client at the Hearing, we suggest that they first provide more information as to what they intend in terms of the planned licensed operation and/or whether they are cutting back their application. This is sensible bearing in mind that their application is scant on operational details and last time around they cut back their Field Day application at the eleventh hour – leading (in all likelihood) to unnecessary management time/legal costs being incurred.

For example, are your clients still proceeding with the full application i.e. seeking maximum capacity of 10,000 or are they reducing this to 7,000 or less? Are they planning to operate 22 hours daily at that capacity or only during certain hours? If your clients wish to "put more meat on the bones" of the current application and their realistic proposed licensed operation, our clients can then consider the additional information.

Your client (Mr Taylor) mentioned at the last Hearing (during the adjournment time) that your clients can provide a lot more detail as to what events/activities are likely to take place at the proposed venue (and what capacities may be involved); for example he mentioned that the live music events would only operate during the Autumn/Winter (September to January?) – although of course that would be in the football season. More details (specifically around likely capacities during the planned 22 hour period) should, in our view, be provided.

I do not think I have seen any Transport Management Plan (other than the one relating to Field Day when no Event is taking place at the Stadium, so is irrelevant to the current application). If a TMP exists upon which you intend to rely to support your clients' current application (for daily use), when the transport system will already be in use in the hours in the lead up to and post Bowl Events at the Stadium, kindly provide us with a copy sooner rather than later.

For the avoidance of doubt, we understand that our clients are currently maintaining their full objection to the application for the reasons already articulated in full. We shall respond separately regarding Philip Kolvin's last minute written submissions (relating to the last application) for example his comments regarding the plans - but please note that we have already emailed Mr Kolvin directly to express our (and our client's) serious concern that some of his submissions were manifestly wrong – specifically regarding the plans which supported the Stadium application for a new Licence in 2018. We trust that the wholly incorrect assertions made last time around will not be repeated, as such repetition (in an attempt to wrongfully sully our client's activities) would be totally unacceptable to our clients, and we reserve their position as regards this matter.

Kind regards

Sue

Sue Dowling
Partner

Sue Dowling

From: Paddy Whur [paddy@woodswhur.co.uk]
Sent: 23 May 2019 08:43:50
To: Sue Dowling
Subject: Drumsheds/Events licence
Attachments: image001.jpg

Good morning Sue,

I am sorry that we didn't meet at the festival application due to me being away.

I have been speaking to my clients about the next application.

We are currently speaking to the police to see if we can resolve their outstanding concerns.

Is there merit in us talking to see if we can resolve your client's concerns?

Paddy Whur
paddy@woodswhur.co.uk

Tel: +44(0)1132343055
M: 07738170137

Woods Whur,
Devonshire House, 38 York Place, Leeds, LS1 2ED



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