

O2 VICTORIA WAREHOUSE, TRAFFORD PARK ROAD, TRAFFORD M17 1AB

PREMISES LICENCE REVIEW APPLICATION

Licensing Sub-Committee Hearing – 11th December 2023

WITNESS STATEMENT OF STEVE HOYLAND

I, **Steve Hoyland**, will state as follows:

- 1 I make this statement in relation to the application by Nicola Duckworth, Environmental Health Officer of Trafford Council (“the Council”) to Review the Premises Licence for O2 Victoria Warehouse (the “venue”) on behalf of the premises licence holder, Academy Music Group Ltd (“AMG”).
- 2 Where I have direct knowledge of the contents of this statement, they are true. Where my knowledge is indirect, they are true to the best of my knowledge, information and belief.
- 3 In this statement, I shall deal with matters in the following order:
 - A. Professional Experience and Background
 - B. The O2 Victoria Warehouse in Manchester
 - C. AMG Operational Policies and Procedures
 - D. Background History of Venue Operation & Engagement since August 2018
 - E. Response to statement of Ms Nicola Duckworth
 - F. Licensing Objectives
 - G. Meetings with Trafford Council

Professional Experience and Background

- 4 I am the Group Operations Manager for AMG and have held this position since October 2021. I have extensive industry experience having worked with venues since 1992, first as a promoter, then as an Entertainments Manager at a large Students Union before moving on to be Head of Venues at NUS Entertainments responsible for training and commercial development for Universities and Colleges across the UK.
- 5 I joined AMG in August 2003 to open the Liverpool Academy as General Manager. I was headhunted by AMG after organising and managing a successful sold-out NUS Grants not Fees concert at the Brixton Academy in 2001. In 2008, I was appointed General Manager at the Leeds Academy after 6 months of preparation in coordinating the development and opening of two major regional venues for the company, the Leeds Academy and the Sheffield Academy which included training and overseeing operational procedures for contractors and new venue staff. Whilst working as General Manager at Leeds, I was a member of the Board of Management for Leeds Pubwatch and heavily involved in advising the Police and Licensing Authority on different events that were taking place in the city. I was promoted to Divisional Manager in February 2011, a role which involved working with General Managers to oversee all aspects of venue operational and commercial development for 7 venues across the estate.
- 6 O2 Victoria Warehouse became one of the venues under my remit from September 2018 until my promotion to Group Operations Manager in October 2021, although I remained involved in meetings with the venue and Trafford Council until February 2022. In addition to this I have further experience of Greater Manchester as I was responsible for overseeing the O2 Ritz from 2015 until 2020.
- 7 During my time as a Divisional Manager, I worked closely with the Chief Operating Officer, Graham Walters, on the strategic, commercial and operational aspects for the most recent AMG venue acquisitions: O2 Victoria Warehouse Manchester; O2 City Hall Newcastle and O2 Academy Edinburgh and was responsible for setting up all areas of the operation for each of these venues prior to opening. In my current role as Group Operations Manager, I am the line manager for five Divisional Managers who report directly to me and with whom I am in regular contact. I am responsible for overseeing the coordination of operations and commercial strategy across the estate and report directly to the Chief Operating Officer.

- 8 I hold a 2:1 BA Hons Degree in International Relations and an IOSH Managing Safely and Level 4 Foundation in Security & Risk Management qualifications. I have passed the National Certificate for Personal Licence Holders (NCPLH) Course and hold a personal licence. I have undertaken the internal Management Development Programme (MDP) course for club and venue managers as well as numerous (more than 15) other in-house management courses covering a range of topics relevant to my role, including Counter Terrorism Action, Crowd Management and Security Management. I also attended a workshop on the Protect Duty legislation run by the Home Office in July 2023 and will be engaged in further consultations and meetings on the detailed provisions in the coming months.
- 9 Over the years of experience with AMG, I have built up a wealth of experience in working in partnerships with all of the local authorities and Police forces around the UK where we have a venue. My approach has always been to be honest, open and committed to working together to resolve any issues that may arise.

The O2 Victoria Warehouse in Manchester

- 10 O2 Victoria Warehouse Manchester is a distinctive and pioneering multi-functional event space that is situated on the outskirts of Manchester's city centre. A true testament to the city's industrial heritage, this Warehouse has stood for nearly a century and is one of Trafford's most notable locations. Capable of accommodating up to 3,500 guests for live music concerts and multi-room events, and with a capacity of up to 5,500 guests for over 18s club nights, O2 Victoria Warehouse is an expansive and agile facility boasting various compartments (known as sheds) which can be used independently or collectively. This adaptability and versatility make the venue an exceptional choice for hosting diverse events, such as live music performances, multi-room club nights, award ceremonies, trade fairs, exhibitions, weddings, and corporate hospitality functions.
- 11 Since late 2018, O2 Victoria Warehouse Manchester has been operated by the Academy Music Group Limited (AMG), the premier owner and operator of live music and club venues across the United Kingdom. Through its extensive network, AMG has established itself as a leading organisation within the entertainment industry, heralded for its exceptional standards and quality of service. AMG's stewardship of O2 Victoria Warehouse Manchester represents a fusion of the heritage of the historic Warehouse with the long-standing expertise of AMG.

- 12 As with the industry as a whole music venues in Manchester, including O2 Victoria Warehouse, were seriously impacted by the Covid 19 pandemic. As one of the city's premier live music venues, O2 Victoria Warehouse has provided a stage for a host of local and international artists. However, the pandemic did force the venue to close its doors temporarily, leading to a significant loss of revenue and uncertainty surrounding its future. Despite these challenges, the venue reopened. O2 Victoria Warehouse remains an integral part of Manchester's rich cultural landscape, and, in my view, its survival is critical to the city's vibrant music scene.
- 13 Earlier this year (2023), Academy Music Group invested in a first-class L-Acoustics K1 industry-standard touring rig at the Venue. With a roster of A-list performers regularly visiting the venue, it now has a touring-quality concert sound system to satisfy any artist's touring requirements along with further financial investment into rigging, truss and in-house lighting. This investment was also a proactive response to Academy Music Group's sustainability commitments, meaning artists no longer need to tour as much audio and lighting equipment, therefore fewer trucks on the roads in Trafford as well as cost-saving opportunities for large-scale incoming productions.
- 14 Since acquiring the Venue, AMG have also invested in a major backstage refurbishment including new dressing rooms, green room and production facilities for touring artists and personnel as well as other significant capital investment.

AMG Operational Policies and Procedures

- 15 Over the years AMG has been operating, the company has developed a comprehensive range of policies, procedures and risk assessments across all operational areas for its business and which address the full extent of risks and operational considerations. The Divisional Managers and I work closely with the Company Health and Safety Advisor and Company Security Director to ensure we are delivering best practice and industry leadership on all AMG Policies and Procedures and risk assessments. They are based on extensive experience over many years and are kept under regular review.
- 16 During the last year, AMG has developed its processes across the whole of its estate whereby an Event Management Plan will be adopted for all events that take place at its venues, incorporating an event specific risk assessment together with operational plans, procedures and risk assessments relevant to the event. This is in effect a consolidation of existing polices, procedures and risk assessments under the Event

Management Plan similar to the approach adopted at festivals and forms part of the revised conditions proposed by AMG in respect of the review application for the Venue.

- 17 In addition to AMG's Operational Policies and Procedures, our security contractors prepare their own Security Plan for each specific venue following consultation with the General Manager and management team. This plan has been updated several times since we took on the venue in August 2018. A copy of the latest Security Stewarding Plan by Compact Security Services, the security and crowd management company for the venue, has been included in the Event Management Plan documentation (Appendix B) sent to Trafford Council on 5th October 2023,
- 18 Venue General Managers, Divisional Managers and the Director of Security Operations attend regular meetings to discuss any updates and amendments to venue specific operational policies and procedures subject to changes in threat level, any specific venue threats and any new legislation. This information is then communicated to the security and crowd management company who, if needed, will update their own Venue Security Stewarding Plan.
- 19 In addition, the company has a separate comprehensive Health & Safety Policy and Procedures Manual which cover all aspects of Health & Safety responsibilities, risk assessment templates, guidance and specific arrangements. These policies and procedures are also reviewed by AMG's Health and Safety Committee, which meets monthly, and updated regularly based on new or revised legislation, new best practices and shared experiences. The documents are uploaded to the online portal for venues to access and are further communicated through the weekly Divisional Manager contact sessions with General Managers.
- 20 Following every event, a Night Report is prepared by the Duty Manager which identifies any issues that may have arisen during the show including general audience behaviour for future learning. The Night Reports are a very useful tool to review any future bookings either at the same venue or across the estate. AMG's operational team circulates information from Night Reports throughout tours so venues can prepare in advance and also speak to other venues outside of our group and share relevant information.

Background History of Venue Operation & Engagement since August 2018

- 21 When AMG took on the lease for the Venue in late August 2018 both myself and Lee Atkinson, the General Manager at the time, met up with several Trafford Council

officers and the GMP to introduce ourselves, which we always do when starting a new operation. We were open and transparent about the Company and our plans for the venue and received a positive response. We explained that AMG would be changing the focus from higher risk clubs and events to look at more mainstream evening concerts. We also discussed with Karen Packer from GMP what our plans were at length including explaining our operating plans, increased security numbers and other changes to the operation. As a result, GMP decided it was no longer necessary to provide Police support and presence on shows. Lee Atkinson went on to forge an excellent working relationship with GMP, which has been continued by Russell Taylor-Toal, our current General Manager with the new GMP licensing officer.

- 22 The first show AMG ran was a sold-out multi-room Sankeys club event on 8 September 2018 which was very successful. We have since steadily built-up show numbers and the quality of show offering and increased the artistic and cultural offering in the area for the Trafford community and the wider Greater Manchester area.
- 23 From the outset, we had regular discussions and meetings with Trafford Council and GMP, especially around the police presence for late night club events, which had always been in place historically under the previous operator. The venue, through Lee Atkinson, raised significant concerns with GMP and Trafford Council (Keiran Hinchcliffe), around the actions and behaviour of hackneys, private hire vehicles, including illegal taxis, travelling into the area from all over the region, and the growing issue of illegal parking pirates that belong to organised crime gangs (OCGs). These OCGs are still in operation in the area 5 years on from the concerns being raised initially by the venue. I am aware that venue management had several meetings with Council officers and GMP during 2019 and into early 2020 to discuss these concerns and attended some of them myself.
- 24 No issues were raised in respect of crowd control, ingress/egress as far as I can recall until June 2019, nearly 9 months after we had started operating the venue. I recall that it was Lee Atkinson who first raised the issue of problems around ingress/egress to Trafford Council due to the closure of the pavement on the opposite side of road as a result of a major building development for a new apartment block. A multi-agency meeting was called to discuss the impact of the development upon the operation of the venue, although this did not result in any positive changes. However, venue management arranged and held a trial road

closure in November 2018 with approval from Highways and Amey. Unfortunately, the trial road closure did not prove to be very effective and despite commitment from both sides to revisit the matter, further discussions did not take place until late 2020/21 largely as a result of COVID.

Response to statement of Ms Nicola Duckworth

- 25 I have carefully read Ms Duckworth's detailed statement prepared in relation to these licensing proceedings. Set out below I provide responses on behalf of AMG as well as additional information and some context to the matters she raises, referring to specific paragraphs of her statement where relevant.
- 26 At paragraph 2 of Ms Duckworth's statement, she refers to a joint visit to the Venue on 9 June 2019. In relation to this visit Ms Duckworth says that she witnessed "*a lack of control in relation to the queuing of people at the start of the evening and dispersal of the crowds at the end of the evening*". At the time, the venue used a significant system of barriers for queuing on Trafford Wharf Road with a large number of staff managing ingress/egress. When the Council's concerns were communicated to the venue, I instructed Compact Security, the venue's security contractor, to work on a new plan with an increase in external security to manage the situation. By way of explanation and context, our queuing arrangement took into account that the road is less busy towards the Manchester United FC end and we did not have permission from the Landlord to queue through the hotel footprint, which I understand had happened historically. It was felt collectively, by venue management, Compact Security and the Landlord that our arrangement was a better alternative than queuing from the other direction where the end of Trafford Wharf Road is more exposed to fast moving vehicles. There is a major junction at the other end and a bridge that crosses the road over the canal and has multiple lanes and heavy traffic.
- 27 In relation to the letter of the 18 July 2019 (NJD/1), I believe from an internal email that Mr Atkinson responded to Ms Duckworth on or around 23rd July 2019 and also sent through the information that had been requested which included a Staff Training Matrix, North West Event Medical Plan with standard operational procedures and events template, pre-doors checklist to include medical room check and a Schedule of booked corporate events with timings and details. Meetings with Manchester United FC and LCC were commenced as well as information sharing on future events. The Venue started to send updated and more detailed information on dates as well as show information to Trafford Council as well as GMP.

- 28 The Venue looked at changing the queuing arrangements via the Man Utd E3 Car Park in late 2019 and Trafford Council were informed about these proposals. In early 2021, a verbal agreement was reached with Manchester Utd FC (Man Utd) for the regular use of the E3 car park on non-match days on a show by show basis for ingress and egress as and when it was available. This was finalised through a lease agreement with the landlord in January 2022. We had also raised with Trafford Council that most of the issues were around illegal taxis and private hires coming into the area from outside the borough and parking/blocking the road. It was indicated by Graeme Levy, Regulatory Services Manager (Trading Standards and Licensing) at Trafford Council by email on 18th March 2019 that little could be done about this issue. I attach a copy of this email as **Exhibit SH1** to my statement.
- 29 At paragraph 3 of Ms Duckworth's statement, she refers to a visit on 5 February 2020 during which she identifies concerns over ingress and egress to the Venue. I understand that the concerns related to patrons being in the road/crossing the road to access the queue from Tram stops and central Manchester. In response, the Venue wished to implement a new extended barrier system to restrict the public from going on to the highway. However, Trafford Council Highways Authority ("Highways") would not allow us to barrier the pavement to stop patrons accessing the road and they would also not allow us to use the cycle lanes temporarily.
- 30 At this time, the Venue was trying to finalise the contract with VW/Man Utd for use of the E3 parking area and this was picked up again in 2021 post-COVID with information sharing and communications about forthcoming events which included Lancashire County Cricket Club and Trafford Council. Whilst I note that Ms Duckworth has expressed the view that the documents and Risk Assessments/plans provided were unsatisfactory, I can confirm that these had been reviewed by senior company health and safety and security representatives and also by myself. AMG's Group Health and Safety advisor also spoke directly with Ms Duckworth to explain our documents and procedures. Compact Security, the Venue's independent security contractor, also reviewed the documentation. Collectively it was concluded that the procedures were robust and satisfactory. In addition, there had not been any historic incidents to our knowledge. As I have already stated, the Venue had engaged with Man Utd and others in communicating when events were taking place. Details of all of our events were sent to Trafford Council, Manchester United and Lancashire County Cricket Club in advance. We did not receive any further suggestions from

Highways as to any other options that could be adopted. The Venue continued to engage and reply to all questions and points raised by Trafford Council.

- 31 At paragraph 4 of Ms Duckworth's statement, she refers to a letter sent on 12 March 2020 (NJD/03). I note that her letter acknowledges that meetings and dialogue are taking place which was the case. At that time, I understand an ad hoc agreement had been reached with Manchester United on use of the E3 car park which was later formalised. Consequently, for the majority of shows where there was no event clash with the football, ingress and egress was via the secure E3 car park. The last show at the Venue before the country went into lockdown due to the Covid pandemic was on 7th March 2020 and the Venue did not reopen again until 23 July 2021.
- 32 At paragraph 6 of Ms Duckworth's statement, she refers to an email of 12 May 2021 from the Senior Licensing Officer at Trafford Council, Keiran Hinchcliffe, (NJD/04). In his email Mr Hinchcliffe indicates that he wants to pick up on the matters covered in the letter attached mainly concerning ingress/egress and asking for a response detailing plans for reopening. The Venue Manager responded to Mr Hinchcliffe's email and sent a copy of the updated Compact Security Plan and, subsequently, a multi-agency meeting took place via Teams on 20th July 2021.
- 33 As indicated above, there was a system for ingress and egress supported by a robust stewarding plan and operational set up. In addition, by agreement with Man Utd, the Venue was now using the E3 car park for the majority of events. In relation to the use of the highway, it was agreed by Highways following the 20th July meeting that the the layby could be used for queuing and that AMG would bring their cones off the road to control the path only.
- 34 At paragraph 7 of Ms Duckworth's statement, she refers to correspondence from Ms Christie following a multi-agency meeting which took place on 9th July 2021 in relation to Traffic Management outside the Venue (NJD/05). The meeting in fact took place on 20th July 2021 as stated in my last paragraph. To put this into context, Lee Atkinson had been asking Trafford Council for advice on action to deal with illegal parking and taxis since early 2019. The company and Venue have always been open to the idea of road closures since issues were first raised with them in 2019.
- 35 Following the meeting, the Venue engaged with several Traffic Management Companies in order to find a solution. It proved to be extremely difficult to formally engage any of the recognised Traffic Management companies due to a combination

of Covid, an extended late festival season and a huge staffing problem within the industry and this problem was communicated to various officers at Trafford Council on a number of occasions. However, in August/September 2021 AMG were able to secure the services of ETC who started working with the Venue on producing a Traffic Management Plan.

- 36 At paragraph 8 of Ms Duckworth's statement, she refers to a visit carried out on 6th September 2021. To put this into context, in advance of the 23rd July show I am aware that an event plan and overview were sent to Trafford Council and this included a new stewarding plan devised by Compact Security for the post Covid era. Claire Whittle from Trafford Council attended the first event as did Karen Packer from GMP. The event went off well. Ingress and egress were well managed and, as planned, the E3 Car Park was used. No issues or concerns were communicated to us either by the officers from Trafford Council or GMP at the time or afterwards. I attended this show and saw for myself how well managed it was and spoke with Ms Whittle and Ms Packer and understood that they were happy with the arrangements for the event. It therefore came as some surprise to me that Suzanne Whittaker expressed concerns about the stewarding numbers and queuing arrangements in her 7th September 2021 email (NJD/06).
- 37 With regard to the visit made by Ms Duckworth on 6th September 2021 and her observations about the system of queuing, I recall seeing a report from the manager with photographs which showed that the queue was on the pavement. In my view, this appeared to be neither disorderly nor dangerous. The show was a low capacity event (approximately 2,000) with a compliant audience comprising of older groups and couples. However, to reiterate, the Venue and our independent security contractors, Compact Security, were constantly reviewing ingress and egress arrangements for all events including where there was a match-day clash. I do not agree with the statement that nothing had changed in terms of queue management. For example, we had obtained permission from Highways to use the layby and bring our cones and fencing off the road to control the path only, as stated above.
- 38 At paragraph 9 of Ms Duckworth's statement, she refers to correspondence from Suzanne Whittaker in relation to reviewing queuing methods. As stated above, the Venue along with its security providers Compact had reviewed the approach to queuing and had sent the planning documentation to Trafford Council via Ms Duckworth. The use of the E3 Car Park applied for the vast majority of shows. The only outstanding issues were match day clashes and road closures which the Venue

were actively trying to find a solution for. The 6th September inspection visit took place when there was a match day clash which is why there was queuing on the pavement. Barriers and cones were put out to protect the public from straying into the road and to stop the cars and illegal taxis parking and create a buffer. As noted above, our dispersal policy and RAMs had been provided to Trafford Council and no concerns had been raised about their content.

39 At paragraph 10 of Ms Duckworth's statement, she refers to correspondence she sent to the Venue on 21st September 2021. In Lee Atkinson's absence, a response was sent by Melissa Bury, the Deputy General Manager, which explained the operating plan and changes made to ingress/egress with staffing details which demonstrated that the concerns expressed had been considered and measures had been put in place to mitigate the risks. Later that evening, I emailed Ms Duckworth setting out the background to the Venue's position and explaining that it would be quite dangerous at this late stage to alter our plans and make alternative queuing arrangements for our event the following evening. I also explained in my email the reasons for the delay in progress with the Traffic Management Plan although we were working closely with an experienced traffic consultant and were close to producing a plan. Ms Duckworth responded to state that the Council intended to serve an Improvement Notice with a 28 day period for compliance. I have attached to my statement a copy of these emails (which are missing from those exhibited to Ms Duckworth's statement) at **Exhibit SH2**.

40 In paragraph 10 of her statement, Ms Duckworth states that there had been no communication with Man Utd: this is incorrect. As I stated above, there had been communications and discussions with them and the ad hoc arrangement for the use of the car park was soon formalised in a rolling one year agreement around this time. Just to be absolutely clear, we do not queue our customers on the road for any events, whether or not there is a match day clash.

41 At paragraph 11 of Ms Duckworth's statement, she refers to the issuing of an Improvement Notice. AMG was very disappointed to receive this Notice which it considered was both unnecessary and inaccurate for the reasons stated in its Grounds of Appeal (exhibited to Ms Duckworth's statement (NJD/09)). AMG were actively working on the proposed Traffic Management Plan and had also provided information to the Council on the updated RAMS; the updated stewarding plan by Compact Security and the agreement in place with Man Utd to use the car park for ingress/egress on non-match days.

- 42 In paragraph 12, Ms Duckworth questions the validity of AMG's appeal against the Improvement Notice. However, Mr Parry acknowledged in an email to the Central London Tribunal on 27th July 2022 that the Council had received Notice of the Appeal by letter on the day following submission of the Appeal (12th October 2021) and asked to be advised as to its current status. I attach a copy of this email to my statement at **Exhibit SH3**.
- 43 In paragraph 13 of Ms Duckworth's statement, she refers to continuing to work with AMG on ingress and egress arrangements and then paragraph 14 refers to Mr Atkinson's email on 6th May 2022 advising that a new General Manager, Mr Taylor-Toal, would be taking over responsibility for the Venue. However, missing from the statement is that several discussions and meetings took place with the Council and Highways throughout the rest of the year leading in to early 2022 regarding the proposed Traffic Management Plan and road closure. On 1st February 2022, a multi-agency meeting was held at the Venue with Council officers and Highways specifically to discuss traffic management issues. The meeting was led by Suzanne Whittaker and the Venue and it was agreed for the first time that the Council would support road closures for all shows at the Venue other than match days. I was present for that meeting together with Lee Atkinson, Melissa Bury (Deputy General Manager) and both AMG's Health and Safety Advisor and Security Consultant. Mr Atkinson sent an email summary of the meeting to Council officers on 15th February 2022. Following an email request from Suzanne Whittaker on 17th February, Mr Atkinson also sent a copy of the Traffic Management Plan on 18th February 2022. A copy of these emails is attached to my statement as **Exhibit SH4**.
- 44 I am aware that meetings and email communications took place between Scott Dow of ETC, our traffic management consultants, and Highways officers and Ian Elliott from Amey. The proposed traffic management arrangements were approved by Highways and Amey, initially with a temporary Traffic Regulation Order which was subsequently made permanent, and ETC commenced operations at the Venue on 1st March 2022.
- 45 To my knowledge, there have been no further meetings or communications in relation to traffic management issues and the road closure arrangements under ETC's Traffic Management Plan (v.1) have been operated successfully from 1st March 2022 to this date.

- 46 An agreement was reached in April 2022 with Man Utd to be able to use a portion of their car park to assist with ingress and queuing on match days. Suzanne Whittaker and Nicola Duckworth helped to broker this agreement by speaking to the football club and this arrangement was put in place immediately. The arrangement for match days involved the smaller cobbled area in the car park right next to the western wall of the building being used for Disney queuing, with the queue then continuing along the north wall of the building, inside the perimeter fence, parallel to Trafford Wharf Road, with the crowd fed into the northern side of the building. This arrangement has worked effectively since April 2022 and no concerns have been expressed about it.
- 47 Consequently, on both non-match days and match days the Venue now had an accepted and agreed method of ingress approved by GMP, Highways and Trafford Council.
- 48 In paragraph 15 of Ms Duckworth's statement, she refers to the application by the Metropolitan Police Service to review the premises licence for the O2 Academy Brixton following a tragic incident on 15th December 2022. The hearing of this application took place on 11th and 12th September 2023. The decision of the licensing sub-committee was to impose revised conditions, many of which were put forward by the company in its separate variation application and all of which were agreed.
- 49 Paragraphs 17 to 33 of Ms Duckworth's statement refer to matters which are variously addressed elsewhere in my statement and in the statements of Russell Taylor-Toal, Keith Forshaw and Abigail Miller. I have seen each of these statements and, so far as matters relate to issues that are within my knowledge, I endorse the comments that have been made.
- 50 In relation to Ms Duckworth's criticisms of the Compact Security stewarding plan in paragraph 20 of her statement, I do not agree with her comments. In my opinion, the stewarding plan is a robust document and covers all of the security needs relevant to the operation of the venue. The venue operates in a similar way for all its events and there is a more than satisfactory security deployment for all sold out shows which is also dependent on the risk factors, including the nature of the show and audience profile. Compact Security are very experienced operators for AMG's venues as well as others and no concerns have been expressed by the police to the stewarding plan and the security operation of the venue.

Licensing Objectives

- 51 In relation to paragraph 35 of Ms Duckworth's statement, I would strongly disagree with her opinion that the licensee has failed to operate the premises in a manner consistent with the licensing objectives. Several of the specific points raised under each heading are answered fully elsewhere in my statement and in AMG's other statements and I do not propose to repeat them here. Mr Taylor-Toal responds to each of the specific points in his statement and I endorse his comments. I have also had the opportunity of reviewing the report from Shield Associates who comment on Ms Duckworth's criticisms in relation to the promotion of the licensing objectives and I agree with their views. For completeness, I have attached a Licensing Objectives Table with AMG's response to each of the points raised by Ms Duckworth in this section of her statement which I attached as **Exhibit SH5**.
- 52 It should be noted that no representations have been made supporting the review application by the police, fire authority or child protection service. Mr Belfield from the noise pollution team has requested revised conditions which have been agreed by AMG. No residents or local businesses have made any representations. There has been no public safety incident at the venue and no complaint by the police relating to crime and disorder. There is no allegation of any breach of the conditions of the licence.

Meetings with Trafford Council

- 53 On 7th September 2023 at approximately 15.45 I received a phone call from Ms Duckworth to inform me that they would be applying for a review of the licence for the O2 Victoria Warehouse and it was a process they were going through with all large venues in the Borough. I asked the reason for the review and Ms Duckworth informed me that they wished to standardise licence conditions for their large venues and she suggested a meeting to try and agree the conditions in advance of a hearing, to which I agreed.
- 54 Included with the Review application and statement served by Ms Duckworth on 8th September 2023 was a document headed 'proposed conditions o2 victoria'. A meeting was arranged for 19th September 2023 at Trafford Town Hall. In attendance for AMG were myself, Russell Taylor-Toal (General Manager), Sian Hayward (Divisional Manager) and Phil Crier, AMG's licensing solicitor. In attendance for the


Council were Nicola Duckworth, Alison Acton, Clare Whittle and, for part of the meeting, James Parry. John Lydon from the GMP was also in attendance.

- 55 There was a brief discussion led by Mr Parry about the status of the Improvement Notice appeal from 2021. Mr Crier explained that he was not instructed on this particular matter and understood the meeting was to discuss the proposed licence conditions as part of the review application. The discussion then moved to general matters raised in the review application and the proposed conditions for which there was some limited progress on revised wording. As there were several conditions which AMG considered were either not appropriate from an operational standpoint or required revised wording, it was agreed that it would be sensible for AMG to send alternative written proposals for officers to have the opportunity to review. AMG also explained its intention to adopt an Event Management Plan and event-specific risk assessment approach for all its events and would send draft documentation to the Council for review. This was welcomed by officers present. It was agreed that following a review of AMG's proposed revised conditions, a further meeting would be arranged to discuss the details to take place ideally before the end of the representations period on 5th October 2023.
- 56 Following the meeting, as agreed Ms Whittle emailed Mr Crier an updated set of proposed conditions which incorporated those proposed by Trading Standards. These were the working draft conditions for AMG to review. On 5th October 2023, Mr Crier sent Mr Parry the draft Event Management Plan (EMP) and appendices documentation along with AMG's proposed revised conditions which included an explanation of the reason for the revision. Following feedback from Mr Parry on the EMP documentation, Mr Crier sent a revised EMP which included an additional Crowd Management section to address the point raised and also an additional appendix (AA1) to explain the procedure for access controls to the balcony during shows.
- 57 I am aware that Mr Parry sent a further revised version with comments from the responsible authorities which AMG reviewed. A meeting was arranged for the afternoon of 19th October 2023, the day before the hearing, to discuss the conditions. The meeting took place at the Town Hall and, in summary, limited progress was made in relation to the conditions. Mr Parry made it clear that he would be inviting the licensing sub-committee to consider whether AMG had the capability or intention to promote the licensing objectives before any consideration took place in relation to the licence conditions. I was aware that Mr Parry had sent an email to Mr Crier on

18th October in which he raised this as his proposed approach to the hearing. I was extremely surprised to hear this as it had been clear in my mind from the outset that officers would be seeking revised licence conditions. This had been expressly stated to me by Ms Duckworth when she called me on 7th September and at no time during the 19th September meeting was there any mention of the Council inviting the licensing sub-committee to consider other options at the hearing. The focus was solely on trying to reach agreement on the conditions and also the EMP documentation which was provided to the Council.

58 Separate to the meetings referred to above in relation to the licence review proceedings, I also attended a meeting with Ms Duckworth and Ms Acton at Trafford Town Hall with Abigail Miller on 27th September 2023 to discuss the Improvement Notice that had been served on AMG. This meeting is explained in Ms Miller's statement which I have had the opportunity of seeing and agree with her comments.

59 In conclusion, I would like to reassure the licensing sub-committee that AMG takes its licensing and regulatory responsibilities very seriously and across the whole of our estate we are committed to working in partnership with the responsible authorities and other agencies. I would hope that our response to matters that have been raised as part of these proceedings demonstrate that commitment and, following the licence review hearing, I intend to hold a further meeting with Council officers together with other AMG representatives to discuss and resolve any outstanding matters and agree a protocol for future meetings and discussions.

DocuSigned by:

Signed:

Steve Hoyland

Date: November 29, 2023