

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

PREMISES LICENCE REVIEW APPLICATION

Licensing Sub-Committee Hearing – 11th December 2023

WITNESS STATEMENT OF RUSSELL TAYLOR-TOAL

I, **Russell Taylor-Toal**, 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”).
- 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. Chronology of Events
 - D. Licensing Objectives
 - E. Recent Changes

Professional Experience and Background

- 4 I am the General Manager of the O2 Victoria Warehouse (“the Venue”) in Manchester. I have held this position since 1st June 2022 following a month-long period of handover from the previous general manager.
- 5 I have over three decades of management experience in the live entertainments sector. This includes more than 20 years at Manchester University Students’ Union, where I advanced from the role of Assistant Bars Manager to Operations Manager.

During my time there, I was part of the senior management team of The Manchester Academy Live Music/concert venues, which comprised four venues with capacities ranging from 600 to 2400, as well as bars in the city centre and various other commercial outlets, all owned and managed by the Students' Union.

- 6 I also sat as a Justice of the Peace at the City of Manchester Magistrates' Court between 2007 and 2011.
- 7 My educational qualifications include the following: MSc in Management Practice, Post Graduate Diploma in Management, and a Certificate in Management from the Institute of Management. I also have a Level 4 in Security Management and am shortly to complete my Level 5 modules which are working towards a BSc (Hons) degree in Security and Risk Management.
- 8 I have carefully read Ms Duckworth's detailed statement. Set out below I provide additional information and some context to the matters she raises referring to specific paragraphs of her statement where relevant.

The O2 Victoria Warehouse in Manchester

- 9 O2 Victoria Warehouse serves as a valuable venue for the Trafford area, playing an important role in showcasing and preserving its rich cultural heritage. By hosting a wide range of events, the venue contributes to the vibrant and thriving night-time economy of the region. Its ability to attract diverse audiences and provide top-tier entertainment not only enhances the local economy but also promotes the cultural vitality of Trafford.
- 10 The Venue recognises the importance of collaboration with its local partners, that is the local authority, the police and the community. It holds monthly meetings with local police licensing officers. Every month the Venue sends a list of events to local authorities (Trafford Council, police, Trafford safer communities and Trafford CCTV control room). This list includes an event-by-event overview with all the event information and a list for all the confirmed events for the next 4 to 5 months to assist with police planning. Our licensing officer has commended the Venue on numerous occasions in relation to this. The Venue has also been used by the GMP on numerous occasions for police dog training free of charge and it has also held ACT Awareness training.

- 11 Prior to the licensing review the Venue was engaging directly with Trafford Councillors, specifically Councillor Fianna Hornby, and later both the leader and deputy leader of the council, around their cultural strategy and community engagement. This led to meetings between the venue and Gorse Hill Studios in Manchester. Gorse Hill Studios is a community-driven recording studio that aims to provide young people from disadvantaged communities with access to music production facilities, training opportunities, and career support services. The intention was for myself and my deputy general manager, Manos Chatzakis, to become mentors to some of their clients as well as offer venue space for rehearsals and performances. This was of particular interest to both the venue and its management team as we can offer a lot to such a valued community group. The venue also wanted to help fundraise for this charity and possibly donate blood packs for the essential work they are doing around discouraging young people from gang activity.

Chronology of Events

- 12 As I have indicated above, I became General Manager at the Venue in June 2022. My first experience of an inspection visit by Trafford Council was on 6 February 2023. On 7 February 2023, I received an email from Ms Duckworth in relation to that visit setting out a number of matters that the Venue needed to address prior to the next scheduled event. On 9 February 2023, I responded by email in detail dealing with each of the matters as identified in Ms Duckworth's email (**Exhibit RT/1**). I also provided copies of the following: the Venue Egress Capacity Assessment, the Building Regulations Capacity Assessment, and the Event Medical and Safeguarding Plan.
- 13 In relation to the availability of hot water behind the bars, I explained in my email that prior to the visit we had already ordered new electric hot water units for each temporary bar which were to be delivered on 10 February in advance of the next show and would be in place for each and every show going forward. In addition to this, we had ordered all the necessary material to construct mobile hand wash stations for each of these bars which would consist of an electric water heating unit, a blue roll dispenser, hand sanitiser and soap.
- 14 As regards permanent bars, I explained in my email that we did have hot water at these bars however, following the visit, we discovered an intermittent fault on the heating system which meant that it could not produce enough hot water at peak times which coincided with the visit. I wrote that we had commissioned a comprehensive survey of the hot water supply throughout the venue and would have this repaired as soon as

possible and, in the meantime, we would supplement what we already had with portable hot water units (as with the temporary bars).

- 15 In relation to the toilet facilities, I explained in my email that there is water available in all restrooms, however, some taps had been damaged during recent shows. There was still plenty available to service each wash area although they had been affected by the same problem as above as the same tank feeds all areas. I stated that this was being resolved as quickly as possible.
- 16 In relation to the food outlet, I explained in my email that issues around water supply had been resolved with the food concession having purchased a portable electric unit which would keep water hot throughout the service. I informed Ms Duckworth that the contractor had replaced the area that the food was prepared and served from to make it easily cleaned and wiped down with antibacterial cleaner. In addition, probe wipes and other means of cleaning would be provided on each and every event that the concession is in use.
- 17 In relation to the medical facility, I explained in my email that the recently replaced hot water heater at the location needed upgrading and that a new unit had been ordered. I also explained that the medical room had now been deep cleaned and new floor covering had been ordered and would be replaced. In addition, I informed Ms Duckworth that our first aid contractor had given us assurances that the cleaning regime would be improved, and all infection control procedures would be followed. I attached to the email the medical plan and needs assessment in place at the time as prepared by the medical contractors and the qualifications of medical staff as had been requested by Ms Duckworth in her email.
- 18 In the final part of her 7 February email, Ms Duckworth asked for the capacity calculations for the Shed A and the Mezzanine area. In my email I provided her with the capacity calculations as requested and invited her to meet with Mr Keith Forshaw, our Group Property Manager, if she had any questions regarding these figures (see page 3 of **RT/1**). Whilst Ms Duckworth observes in her witness statement that there was no explanation as to how these figures had been reached, I have no record of her asking for further information about these figures. If the Venue had been asked about this we would have provided the information. We did provide our Victoria Warehouse Egress Capacity Assessment Drawings and ABD Capacity Assessment to Ms Duckworth to offer further insight into the calculation process. Again, if any further information had been requested this would have been readily provided.

- 19 Ms Duckworth also requested in her 7 February email the crowd management plans for the Mezzanine Area and Shed A. I explained in my email that we were undertaking a review and update of all our processes and procedures across the company. I indicated that we would have the management plans within 14 days. I also stated that we were more than happy to run through everything with her on site at a mutually agreeable time. I provided the relevant plan on 20th February by email (see paragraph 25 below).
- 20 Ms Duckworth also requested in her 7 February email the structural calculations for the Mezzanine to support the capacity calculations/crowd management plan. I informed her in my email that this would be provided by the Landlord within 14 days. As I explain further below, this was provided on the same day I received it myself.
- 21 Ms Duckworth, at paragraph 17 of her statement, observes as follows: *“At the time of the visit, I questioned the management of the crowd, as it appeared that there was a lack of control on how many people were able to access the first floor level of the building. Whilst a steward was positioned at the bottom of the stair case, he did not appear to have any means of counting or instruction on numbers he was to allow up onto the first floor”*. No questions were directed to me about this at the time of the inspection. Whilst it is right to say that we were not counting or ‘clicking’ attendees in relation to access to the first-floor level, we had in place security personnel at the bottom of the stairs and at the top of the stairs (access to the area) monitoring access. We were also monitoring the number of attendees using CCTV. These measures were put in place having regard to our experience over years that the vast majority of attendees stay on the ground floor and few seek to access the first floor level and also that there has never been an issue with numbers on the first floor. That being said, once this concern was communicated, we started to monitor the numbers by security staff “clicking” them in both on at the bottom of the stairs and at the top of the stairs.
- 22 Ms Duckworth, at paragraph 18 of her statement, states as follows: *“The first floor of the building was made up of a bar area/ toilets and a balcony which was looked out onto the main shed A, where live music acts played. I was unable to find any event specific information about how this was managed.... I was informed at the time that the company were currently working on putting a plan together” (NJD/12)*. As stated above, at the time of the inspection, AMG had instigated a review and update of all its processes and procedures throughout the group. I do not recall being asked about this during the inspection but as stated above in her email a request was made for the crowd management plans for the mezzanine area and shed A and I responded as

above. At the time, we didn't produce event specific assessments but rather had a suite of documents that would constitute a suitable and sufficient risk assessment which we would change as and when was required. AMG has now completed its review and since October of this year the Venue now has specific event management plans and risk assessments in place.

- 23 I provided the Security Stewarding Plan on 20th February 2023 to Ms Duckworth as requested in her 7th February email (**NJD/13**). The Plan was from Compact Security, our security contractor (**NJD/13**). I agree with Ms Duckworth at paragraph 20 of her statement, that in order to risk assess the need for the numbers of stewards it is important to look at each event. That being said, unlike an outdoor venue where capacity can vary, as an indoor, medium sized event space which hosts a variety of events including live shows that share a similar operational structure, the saleable capacity remains consistent. At an operational level, we carefully review each show to ensure that any necessary adjustments are made concerning the numbers of both SIA security and stewards, and staff are booked accordingly. I am not aware of any concerns or issues which have been raised in relation to the provision for events. I do not recall Ms Duckworth raising any concerns about the plan received.
- 24 At paragraph 21 of Ms Duckworth's statement, there is a reference to an email being sent to the Venue on 8 March 2023, in relation to an event clash with Manchester United FC. However, this email is not exhibited by Ms Duckworth and I cannot find an email from her from 8 March. I did however receive an email from Ms Duckworth sent on 7 March which asks me to confirm the finishing time of the scheduled concert on the Thursday and plans for road closures and noting that I had spoken with John Lloyd of Greater Manchester Police (GMP) in relation to this (**Exhibit RT/2**).
- 25 On 8 March, I spoke with Ms Duckworth over the phone and then sent a follow up email which I exhibit. I recall that during the call Ms Duckworth asked whether our traffic management company had liaised with the Manchester United traffic management company. I do not recall her asking for a risk assessment. In my follow up email I write as follows: "Further to our conversation just now, the concert at O2VW on Thursday night will curfew at 11PM. As discussed, I will have our TMC coordinate with United TMC for Trafford Wharf Road Closure. Please forward me contact details for MUFC Traffic Management company so I can arrange this" (**Exhibit RT/3**). I provided her with a copy of our Traffic Management Plan for her perusal. On 9 March 2023, Ms Duckworth emailed me, copying in representatives from GMP and Manchester United (MUFC) in relation to Traffic Management planning and in

particular, to provide contact details for the traffic management company who work with MUFC (**Exhibit RT/4**). There was no request made for a risk assessment nor were any issues or concerns raised in relation to the Traffic Management Plan provided. Whilst Ms Duckworth describes this as generic in her statement, this reflects the fact that the plan would remain the same regardless of the event.

26 On 21 April 2023, I emailed Ms Duckworth with an update on the works being carried out since the visit in February. I also provided a structural report for the balcony area from consulting structural engineers (calculations and drawing), by Harry Seymour & Associates, as requested which I had only received on that day (**Exhibit RT/5**). This included detailed descriptions of the work carried out at the venue following the visit on February 6. I note in Ms Duckworth's statement, at paragraph 22, that following receipt of the report further information was required but I did not receive any request for further information. If I had received any request for further information I would readily have provided it. I note that, at paragraph 23 of her statement, Ms Duckworth states that she "chased a response to the email as I still had not received one" and refers to exhibit **NJD/15**. As I have already indicated, I did not receive any direct request for information following my 21 April email. Exhibit ND/15 appears to show an email sent from Ms Duckworth to Billy Liggins of Kuit Steinart Levy LLP on 17 May cc-ing GMP, Trafford Council and Amey. I am not included in this email. What is described as a chasing email to the same Billy Liggins was sent on 19 June. Whilst I was copied into the email it was addressed to Mr Liggins who has no association with AMG and refers to the licensing application for tobacco stores. It appears that Ms Duckworth may have confused AMG with the VW group as I am aware that Tom Brinkworth is the VW Group General Manager. I did not appreciate because it wasn't clear from the email that I was the intended recipient. I can confirm that at no stage did I receive a call from Ms Duckworth chasing this information up.

27 On 28 June, I received an email from Ms Duckworth addressed to myself, copying in Jonathan Reeves of AMEY, stating: "Hi Russel, I was wondering if you could help me. I am still outstanding information in relation to the structural stability of some areas. Are you able to come back to me as soon as possible". I responded on the same day as follows: "Hi Nicola, I sent the attached to you last April. I trust this now settles the matters". Ms Duckworth responded to say "Thanks for the response. Unfortunately, we have further questions which follow on from the information which you provided. Those additional questions have not yet and are included in the email which was attached". This was the first time I was aware that Ms Duckworth had further questions. I

responded on 29th June as follows: “Thanks Nicola. However, those questions are related to the Tobacco Stores application, VW Group. I’ve CC’ed Tom Brinkworth, VW Group General Manager.” I received no response to this email nor any communication from the Council (**Exhibit RT/6**).

- 28 I became aware that Trafford Council still required information about the balcony when I received an email from Alison Acton on 8 August (**NJD/16**) some 5 weeks after my last communication with them. I responded to Ms Acton on 10th August advising her that I had passed on her email to the Head Office of AMG and explaining that VW Group are a separate company to AMG and that I assumed that Tom Brinkworth (of VW Group) had been copied in as they had recently licensed an area on the upper floor of the building which we occupied.
- 29 I note that the email from Ms Acton acknowledged the difference in responsibilities between the venue and the landlord and requested a copy of the lease to clarify these issues, but it also widened the scope of what was being asked of the venue. The requirement to provide structural information pertaining to the upper floors of the building had not previously been requested. I note that the email states that the council had not received anything since February, however, I personally provided information in April as demonstrated by exhibit **NJD/14**. An email which went unacknowledged. To reiterate, at this point, I believed that we had complied with all the requests and only discovered in August that the council required further information.
- 30 I note that in her statement, at paragraph 24, Ms Duckworth expresses concern about the fact that the Venue “should have assessed the suitability of the venue for the activities which are being carried out there”. To put this into context the venue has been operating as a music venue since 2012 when it was operated by different operators. I am not aware of the Council raising this as an issue with the previous operators and, so far as I am aware, throughout the time AMG have operated the Venue there has been no issue as regards its suitability for the events held there.
- 31 As is demonstrated by exhibit **NJD/17**, Mr Forshaw from AMG spoke with Ms Acton on 16 August and followed up his call with an email forwarding an email from Richard Stone a chartered structural engineer with Booth King. Mr Stone confirms that a site visit had been conducted which involved a frame design check on the balcony steelwork in order to verify that the balcony could continue to be used. Mr Stone confirms that a 2D frame model has been run to resolve queries about the balcony in order to provide comfort that the structural design is adequate for the demands of use.

He notes, amongst other things, that the applied design load of 5kN/m² is approximately double the maximum capacity of the people on the balcony “which should provide some further comfort”. He states that further to the design analysis undertaken during his inspection he observed no signs of distress on the structure, including the bolts, brickwork and concrete and concludes: “*We are therefore of the view that the structure is within design and serviceability limits and can continue in use*”. He goes on to suggest further analysis to check if there are any vibration issues whilst noting that “*the fact there is no sign of distress, nor complaints of “bounce” in the balcony over the years of use suggests this is a conservative check, but it would close out any concerns*”. As can be seen in Mr Forshaw’s response to Booth King, he asks him to draft a proposal for the further assessment work with a timescale. Whilst Ms Duckworth appears to suggest at paragraph 25 of her statement that “a structural engineer had recommended that the balcony which overlooks Shed A be restricted to 25 persons, from the original figure of 660, until sufficient checks could be carried to to[sic] ascertain the structural integrity” this is not reflected in Mr Stone’s email (exhibited at **NJD/17**). As is clearly demonstrated by Mr Forshaw’s email this is a suggestion from Mr Forshaw whilst a full analysis of the balcony is completed. I understand that 25 persons was suggested as an operational restriction as this reflected the number of attendees who would use the balcony with access issues.

- 32 A further visit was carried out by Trafford Council on 23 August. That night the scheduled event was a concert by pop band, TV Girl. I note that Ms Duckworth does not identify any concerns in relation to queuing or traffic management in relation to the event. She records that she spoke to the medical team “*as they had expressed concerns that they had been moved from their usual positions and therefore they may find it difficult to reach or attend to casualty should an incident happen*”. I can confirm that the medical cabin has been in the same location since AMG took over the venue. That being said, this concern was never communicated to me either by the medical provider or by the Council at the time of Ms Duckworth’s visit or subsequently. We were asked for a copy of the medical assessment, produced by the medical provider as medical professionals, which was duly provided. Whilst Ms Duckworth takes the view that it is general in nature, the context of the assessment should be taken into consideration. As I have previously explained, the Venue operates in the same way for the majority of its shows. That being said at our weekly operations meetings medical provision for upcoming events was discussed and additional medics requested having regard to the nature of the event. As stated above, the concern identified by Ms Duckworth has never been communicated to the Venue until the receipt of Ms

Duckworth's statement. It goes without saying that if it had been, we would have responded accordingly as we would absolutely prioritize the safety and well-being of all attendees. We are committed to ensuring that all aspects of the venue comply with regulations and safety requirements.

- 33 At paragraph 27 of her statement, Ms Duckworth notes that a health & safety risk assessment was requested which was specific to the event being held on the night of 23rd August 2023 whilst the TV Girl event was going on. The Environmental Health Officers became impatient and seized an out-of-date original hard copy file of risk assessments. As previously mentioned, AMG was still undergoing a review of all operating procedures which I explained to them. I suggested that we arrange a meeting to go through this review process together. However, this suggestion was not taken up. I was keen to be of assistance and ensure that our relationship was a co-operative one and requested a sit-down meeting to iron out any issues and understand the EHOs' real concerns with the venue. Unfortunately, this was not taken up.
- 34 At paragraph 30 of her statement, Ms Duckworth notes that she/they were informed that a Building Control certificate for the change of use from a warehouse to a music venue had been found. At paragraph 31 of her statement, Ms Duckworth notes that Trafford Council have not issued a completion certificate. I can confirm that I have been assured by the Landlord that he has provided the Council with the Completion Certificate although I do not actually know if this is the case.
- 35 On 23 August, I also provided by email to Ms Duckworth the AMG organisational structure and the TV Girl Steward Briefing Sheet (**Exhibit RT/7**). In an earlier email on the same evening I also provided the following: (1) The Emergency Operations Plan, (2) The Event Management Plan for TV Girl for 23 August 2023, (3) The AMG Health & Safety Policy and Procedures Manual (4) Compact Security's Risk Assessment for the Venue prepared in January 2023 which addresses, amongst a number of risks, the risk of terrorism and (5) the Traffic Management Plan (**Exhibit RT/8**).
- 36 On the following day, 24th August, Ms Duckworth responded by thanking me for the information provided which she said she was still in the process of reviewing. She goes on to say: *"I thought it would be useful to email as you mentioned last night a couple of things which may be able to sort quickly. You mentioned you believed AMG had managed to locate a building control completion certificate- it would be useful for us to view this as soon as possible. The Improvement notice status was also mentioned last*

night, I think you believed this was still outstanding. Our legal team have contacted AMG legal to try and ascertain the status of this notice and have not had a reply. They have also tried to locate the appeal in the courts and have been unable to do so. If the notice was not appealed, we are in a position where we need to establish compliance or not, as the notice was we believed put on hold when you notified us of the appeal" (Exhibit RT/9).

37 I responded by email in full on 25th August to assure Ms Duckworth that AMG was committed to maintaining a collaborative working relationship with Trafford Council in terms of arrangements to ensure that events at Victoria Warehouse are managed in compliance with health and safety legislation. I reminded her that in terms of the balcony, it was currently subject to limited occupancy pending submission of material to validate the integrity of the structure an arrangement which had been agreed with the Council. I confirmed that the Appeal of the Improvement Notice had been lodged with the Employment Tribunal on 13 October 2021 and provided a copy of the acknowledgement letter received from the Employment Tribunal. In relation to the First Section 20 HSWA Notice, I went on to explain that we had received legal advice to the effect that, although a copy could be made, the Council did not have the power to seize the file of paperwork which had been seized by them on the evening of 23rd August and asked that arrangements be made to return the file to the Venue as soon as possible. In relation to the Second Section 20 HSWA Notice which requested various documents and information in relation to the event on 23 August I noted that I had disclosed the documents and information requested and, in effect, asked her to confirm that the notice had been satisfied (**Exhibit RT/10**).

Licensing Objectives

38 I note Ms Duckworth's opinion in her paragraph 35 and, respectfully, do not agree for the following reasons:

Public Safety

39 Para 35 A - Over the entire period of AMG's operation of the Venue there has never been an issue in relation to public safety and all events have been delivered in a safe and secure manner.

40 Para 35 B - The change of use from a warehouse to a music venue occurred 6 years before AMG took over the operations of the Venue. As stated above, my understanding was that the Landlord has provided the Council with a completion certificate.

- 41 Para 35 C – The Council has been provided with structural assessment reports from the Landlord and AMG. No issue or concern has been raised by these reports which verify the structural integrity of the venue.
- 42 Para 35 D – As referred to above a number of documents were in place which constituted a suitable and sufficient risk assessment and these were provided to the Council. In addition, we held and continue to hold weekly, documented meetings in the course of which we thoroughly discuss each event, consider all potential risks and devise appropriate mitigation strategies. This process serves as an ongoing risk assessment to ensure the Health and Safety of all attendees. Maintaining the highest standards of safety is our top priority, and we are committed to implementing all reasonably practicable measures to achieve this goal.
- 43 Para 35 E – Since October, we have made changes to our operational procedures. We have implemented event management plans with individual show risk assessments to ensure the safety and security of all attendees. The Council had been notified and had sight of these updated plans prior to the first licensing hearing on 20th October 2023. These new plans take into account specific risks associated with each event and have been designed to cater to the unique characteristics and challenges of our venue. As ever, AMG wishes to engage in collaborative manner and would engage with any concerns or recommendations by the Council in relation to the implementation of the event management plans.
- 44 Para 35 F – We maintain regular communication with prominent venues such as Manchester United and Lancashire County Cricket Club. These interactions allow for the exchange of information and collaboration.
- 45 Para 35 G – AMG take the threat of terrorism very seriously and are committed to adapting its practices to best ensure the safety of all those involved in our events. We have taken appropriate measures to address the anticipated requirements of the Protect Duty, reflecting our commitment to ensuring the safety and security of all individuals attending our events. The Council has been provided with Compact Security's Risk Assessment for the Venue which addresses the specific risk of terrorism including particular types of terrorist threat from hostile reconnaissance, suspect packages and IEDs (**Exhibit RT/11**). No issues or concerns have previously been raised in this regard. Additionally, our venue has a robust Security Operating Plan in place that covers all aspects of security, including antiterrorism measures and

attack methodologies. The plan has been developed with the highest level of expertise and consideration for potential threats.

46 Para 35 H - It is standard practice for a professional security company, applying their expertise, to advise and write up a Stewarding Plan for their staff. In addition, AMG provides a Security Operating Plan which our contractors adhere to.

47 To ensure the safety and security of our events, we employ a team of between 50 and 60 security and stewards for each event. It is important to note that out of this team, only a maximum of 4 individuals are specifically designated as stewards, while the remaining personnel are fully trained SIA Security personnel. The distinction is made to ensure that we have a balanced deployment of resources that covers both general security needs as well as specialized crowd management requirements. We understand the importance of effectively conveying safety messages to both our security personnel and event attendees, particularly with regards to crowd management. If Ms. Duckworth would like to provide specific guidance or recommendations for a security brief that addresses the Council's concerns, we would be more than willing to review it and, if appropriate, incorporate it into our existing procedures. I wish to point out that no indication of these concerns had been brought to my attention as the General Manager prior to the receipt of Ms Duckworth's statement. I want to reiterate that if such concerns were raised, I would have taken immediate action to address them.

48 Para 35 I – Prior to the service of Ms Duckworth's statement, no issue had been raised in relation to the training of medical personnel or the content of the medical plan. I want to emphasize our commitment to ensuring the highest level of safety and care for all attendees at our events. We understand the importance of having a comprehensive and detailed medical plan in place, as well as ensuring that our staff are adequately trained to handle any medical situations that may arise. If there are specific areas where our medical plan can be improved or elements that should be included, I welcome Ms. Duckworth's input and feedback. Additionally, if there are any concerns regarding the training of our medical team, I urge Ms. Duckworth to bring them to my attention so that we can address them promptly and effectively.

Prevention of Public Nuisance

49 Para 35 J – I wish to note that this particular concern has not been previously brought to my attention by Ms. Duckworth. If there are areas where the plans can be improved

or further measures can be implemented, AMG will of course work collaboratively with Ms. Duckworth to find appropriate solutions. By working together, we can ensure that our plans align with the best interests and concerns of the local community.

50 Para 35 K – The impact of parking when an event is on has been considered. It appears that issues are caused by ‘parking pirates’ operating in the area. I have personally and regularly raised this matter with Nicola Duckworth, Alison Acton, and John Lloyd, our police licensing officer. I exhibit the minutes of a meeting on 2 March 2023 where I raised this issue and asking for clarification on who was responsible for the issue, the Police or the Council (**Exhibit RT/12**). I noted that the ‘pirates’ often have conflict with road closure personnel. The minutes record that John Lloyd (the licensing officer) stated that the situation is complicated as some of the land used by pirates is private so there is no jurisdiction but that the situation would be monitored. Furthermore, I raised this issue with the leader of the council when he visited the venue directly.

51 Para 35 L - In relation to event clashes, the Venue is happy to engage with other venues in the area holding events. This is a shared responsibility and should not fall entirely on our venue's shoulders. Indeed, it has been agreed that there will now be meetings with MUFC and LCCC on a quarterly basis. Our last meeting was on Friday 15th September this year. In attendance was Jim Liggett, Operations and Maintenance director of MUFC, Peter Ash, Head of Event Operations LCCC and his deputy.

Prevention of Crime and disorder

52 Para 35 M – Please see paragraph 53 above.

53 Para 35 N – As professionals with years of experience in managing indoor general standing venues, our documents have been carefully developed to assess and address all potential risks, including those related to crowded spaces. We have taken into account various factors such as crowd management, emergency evacuation procedures, and venue layout optimisation to ensure the safety and well-being of all individuals attending our events. We strive to maintain the highest standards in management, and we are open to any specific recommendations or suggestions the Council may have to further improve our documentation in this regard. During AMG's operation of the venue, there has been no increase in criminal activity. The only notable crimes have been phone thefts, which is a recurring problem for venues across the UK and Europe.

54 Para 35 O – Please see paragraph 47 above.

Prevention of Children from Harm

55 Para 35 P – No issue has been raised with the Venue at any stage in relation to harm caused to children or vulnerable individuals. That notwithstanding, since September 22nd this year, we have engaged W.E.L Safe CIC to address such issues. W.E.L Safe CIC is a well-established safeguarding company that provides event safety and welfare services to various venues and events in Manchester and further afield, including the Warehouse Project, Albert Hall, Park Life festival and Kendal Calling festival. They are specifically engaged to look after welfare issues caused even before the event, eg by young persons queuing early at the venue, and they remain on site throughout the show to deal with any safeguarding issues that may arise. They have created an app that the venue can access reporting their engagement with customers within our venue. This way, we can amass significant data that will help us improve our services, and they can improve theirs. We are thrilled to be working with this exceptional company to help solidify our existing community work.

Recent Changes

56 As part of the agreed company process to adopt an event management plan approach for all events held at the Venue, I collated a series of documents which have formed the appendices to our draft Event Management Plan and these were subsequently submitted to Trafford Council by our lawyers on 5th October 2023. All these documents are consistent with how the Venue has been operating to date and are now incorporated within the event management plan which will be adapted along with the event specific risk assessment for every event held at premises.

Conclusion

57 I am committed to working in partnership with the Council and others to ensure that the Venue continues to operate safely and successfully. By working together, we can share best practices and ensure that Trafford remains a hub for exceptional entertainment experiences with high standards of safety. This has always been my approach at all the venues I have previously worked at.

58 I am dedicated to upholding the safety and well-being of all guests who attend O2 Victoria Warehouse. After the visit from Trafford Council in February 2023, we took immediate action to address all of the concerns they had. We understand the importance of maintaining a safe environment for all attendees, and we take this responsibility seriously.

59 I am proud to say that throughout the Venue's operation, we have had no issues related to public safety, prevention of public nuisance, prevention of crime and disorder, or prevention of children from harm. This track record reflects the dedication and thoroughness with which we approach our operations.

60 We also have a strong desire to engage more with local community groups and charities. We recognise the value of giving back to the community and contributing to its cultural vitality. By partnering with local organisations, we can create mutually beneficial relationships and support causes that are important to the people of Trafford.

61 Overall, as the General Manager of the O2 Victoria Warehouse, I am committed to providing exceptional entertainment experiences while prioritising the safety and well-being of all attendees. Our track record, dedication to collaboration, and commitment to community engagement are all part of our mission to continuously improve and contribute to the cultural fabric of Trafford.

DocuSigned by:
Russell Taylor-Toal
Signed:2ED6C78EA8424311.....

Russell Taylor-Toal

November 29, 2023
Date:.....