

From: Phil Crier
To: James Parry
cc. Joanne Boyle; Licensing
Sent 23rd November 2023, 12.07

Dear Mr Parry

I refer to my 17th November email below and note that I have not received a reply.

I have consulted with Leading Counsel who, as you are aware, will be representing AMG at the hearing on the 11th December 2023. We are keen to help facilitate a productive case management for the hearing so that committee members are able to concentrate principally on any matters of dispute between my clients and the responsible authorities whom you represent.

As I mentioned in my 17th November email, AMG will be submitting considerable additional statements and documentation for the 11th December hearing and I will copy you in on the emails. In relation to the EMP documentation, selective documents were submitted to the licensing authority for inclusion in the Agenda papers before the last hearing on 20th October 2023. These included the updated draft EMP v.4 which was sent to you on 16th October following your email query on the 13th October. The balcony access controls appendix AA1 was not included in the documents sent to the licensing authority for the 20th October hearing and I will include this with the additional documentation to be submitted for the 11th December hearing.

In relation to the other EMP Appendices (which total 35 documents), in the interests of time management, unless you have any particular issue that you wish to raise on any specific policy, procedure or risk assessment, we do not intend to submit all these documents for the hearing on the 11th December 2023. Please indicate by reply if there are any documents from the EMP Appendices that you do wish to challenge or query and so should be included with AMG's additional documentation and, if this is the case, please also explain the particular issue that you wish to raise.

With regard to the AMG Revised Proposed Conditions sent to you with my email on the 7th November and the Licence Conditions Table sent to you with my 17th November email, please can I again ask for your now urgent response so that we can identify the matters that remain in dispute to assist committee members for the 11th December 2023 hearing.

I look forward to hearing from you as a matter of urgency.

Regards

Phil Crier

PBC Licensing Solicitors
Compton House
79 New Road, Ascot
Berkshire SL5 8 PZ