

Exhibit SH2

From: Duckworth, [REDACTED]
Sent: 22 September 2021 12:14
To: Steve Hoyland [REDACTED] Melissa Bury
<[REDACTED]> **Cc:** Whittle, Clare <[REDACTED]>
Whittaker, Suzanne <Suzanne.Whittaker@trafford.gov.uk>; Lee Atkinson
<[REDACTED]>; 'Phil Crier' <[REDACTED]>
'Karen.Packer@gmp.police.uk' <[REDACTED]> Shaw, Nicky
Nicky.Shaw@trafford.gov.uk
Subject: 02 Wednesday 22nd

Steve

Thank you for your email. Firstly it is important that we understand what happened on the night of the 6th September. At no point was Lee threatened with a closure notice. The matter which was discussed was the removal of the risks of people queuing on the public highway for some distance away from your venue and across what is a very busy road.

It was agreed that the safest option was to use Disney queuing the E3 carpark(which was available to you at the time as no MUFC fixture) for further events, a matter which I believe was agreed at previous meetings as the safest option. Also at the time of our arrival there was only two stewards managing the queue who went no further than the wall at the side of the venue (start of E3 carpark). That at the time was not deemed as acceptable and we intervened to ensure that this changed.

The options available to us at the time were a legal notice, preventing queuing in this manner in future, something which lee felt was not necessary so he agreed on a written undertaking. It was not served at the time as the queue was already in place and persons were already moving into the venue.

I have outlined the local authorities concerns to you this is not new information to yourselves and was in fact mentioned towards the end of 2019 and during meetings in 2020 prior to the lockdown. I realise Covid has affected your progress, but the risks outlined then have not gone away.

Therefore I would strongly urge that you take steps to ensure the safety of the ingress of the spectators this evening and where possible queue within the curt ledge of your premises or adjacent premises such as the hotel. I also urge you to consider in light of the increased footfall and vehicle activity this evening to ensure that you have adequate numbers of stewards outside the venue to ensure safety of all people. I note from your deployment plan you only have 4.

I would urge that you investigate further options for queuing systems for any future events which are being held prior to the completion of your traffic management project.

An improvement notice under the Health & Safety at Work Act will be served this week to ensure that a thorough suitable and sufficient risk assessment is carried out in relation to the access and egress of the premises. This risk assessment notice will be given a 28 day time scale for compliance to ensure that the risk assessment is carried out and the controls implemented. A further improvement notice will be served requiring a fully implemented transport management plan with a time scale of 28 days.

We will continue to monitor events which are happening at your premises and will keep in mind the full range of licensing and health & safety enforcement options open to us during this time.

Should you wish to discuss anything further please do not hesitate to contact us.

Regards
Nicola Duckworth
Team Leader Environmental Health (Safety at Sports Grounds Lead)
Regulatory Services
Place Directorate
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Trafford Town Hall
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From: Steve Hoyland [redacted]
Sent: 21 September 2021 21:23 **To:** Duckworth, Nicola
Melissa Bury <[redacted]> **Cc:** Whittle, Clare
<[redacted]> Whittaker, Suzanne <[redacted]> Lee
Atkinson <[redacted]>; Phil Crier <[redacted]> Steve
Hoyland steve@academy-music-group.co.uk
Subject: RE: Wednesday 22nd

Nicola
Thanks for your patience with my reply as I am at our venue in Edinburgh and have been in meetings all day.

Whilst we agree that the use of the E3 car park is now clearly the favoured ingress method by all parties, It is important to recall that AMG have been clear in our position that we would not be able

to commit to the ingress operation through the E3 for all shows due to the nature of the agreement that we have with Manchester United.

With reference to the show tomorrow night and your request for us to dramatically alter the way that we plan to operate at this very late stage, I would like to highlight the factors below which we have taken into consideration together with our security provider CSS and the event promoters SJM Concerts, in coming up with the best and most appropriate workable plan B as a result of being unable to operate via the E3 car park.

During your previous visit to the venue, Lee was put under extreme pressure on the night with the threat of a closure notice due to a queue of approximately 800 people that was completely cleared by approximately 19:40hrs.

Whilst Lee has given a commitment under duress not to operate ingress via the pavement, and we did immediately change the way that we worked for the next day, in reality if E3 is unavailable we do not have another viable safer solution for ingress at this moment in time.

However, as you know we are working with a traffic consultant who specialise in large scale events and festivals as well as Live Nations Director of Security Operations to come up with a more suitable plan B. This is taking longer than we would have liked due to a combination of Covid, an extended late festival season and a huge staffing problem within the industry. We are now close to a plan and we will submit this to you once we have it.

Our event was confirmed April 2021 and the football fixture was finalised in the last 2 weeks so which doesn't allow for us to plan properly for a completely different way of working – we have to make advance arrangements for production loads in, truck and bus parking, booking of staff, delivery from breweries etc to all fit in and work within in a very narrow window at a time when the entire industry and wider distribution network is in turmoil.

The expected 2500 attendance, will make very little difference to a football crowd of circa 70,000 in the area.

It makes complete sense to initiate the back up plan of an operation that all of our staff and contractors are used to and experienced in working.

To change this now to a new, untried method of ingress would be dangerous and cause mass confusion for all.

I would also point out that

- The show is one of the lowest risk events that we will host at the venue and will be a relatively small event for us. The audience will clearly be aware that there is a match on at Old Trafford and such will be more alert and aware of their surroundings
- The audience profile is 18-35, well behaved, low alcohol consumption and obedient so with a significant security presence directing people into the venue as quickly as we can we are confident that this is best course of action.
- The vast majority of the football crowd will be in and around the immediate vicinity of the stadium by the time we will experience our main body of ingress – whilst we will try and open doors a little early to deal with any early queuing fans, the headline artist will be on stage after 9pm and finish at 10.30pm ish meaning that our audience should miss the main throng of football crowds.

We are really close to an acceptable long term solution for all – _so I think that to start chopping and changing now would be really unwise

Am travelling to Leeds tomorrow morning on the train first thing then I have a couple of appointments – _should be in the office from 2.30pm.
Best regards Steve

From: Steve Hoyland

Sent: 21 September 2021 17:13

To: Duckworth, Nicola <[REDACTED]> Melissa Bury
<[REDACTED]> **Cc:** Whittle, Clare <[REDACTED]>;
Whittaker, Suzanne <[REDACTED]>; Lee Atkinson
<[REDACTED]> Phil Crier <[REDACTED]>; Steve Hoyland
<[REDACTED]>

Subject: RE: Wednesday 22nd

Hello Nicola,

Thanks for your response. I am in Edinburgh in meetings but will reply in full later this evening when I get to our office in the city.

SH

From: Duckworth, Nicola <[REDACTED]>

Sent: 21 September 2021 16:53

To: Melissa Bury <[REDACTED]> **Cc:** Whittle, Clare
<[REDACTED]> Whittaker, Suzanne <[REDACTED]> Steve
Hoyland <[REDACTED]>

Subject: RE: Wednesday 22nd

Hi Melissa

When we visited on the 6th September and met with Lee he gave a written undertaking that queuing of people would cease on the pavement /highway , as it was unsafe and we were considering serving a legal notice to this effect. The fact that there is also a Manchester United fixture taking place at the same time , makes the situation in relation to crowds even worse.

Therefore you should review your procedures immediately and arrange for an alternative queuing system which is within the curt ledge of your premises or any adjacent premises and come back to me asap.

Regards

Nicola Duckworth

Team Leader Environmental Health (Safety at Sports Grounds Lead)

Regulatory Services

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[REDACTED]

From: Melissa Bury [REDACTED]
Sent: 21 September 2021 16:46 **To:** Duckworth, [REDACTED] > **Cc:**
Whittle, [REDACTED] Whittaker, Suzanne
<[REDACTED]> Steve Hoyland <[REDACTED]>; Lee
Atkinson <[REDACTED]>
Subject: RE: Wednesday 22nd

Yes, the plan is to queue people on the pavement as we are unable to use E3 car park. The measures we are putting in place will minimise time spent in that queue on the pavement, and get people into the venue as quickly and safely as possible.

Thanks
Mel

From: Duckworth, Nicola <[REDACTED]>
Sent: 21 September 2021 16:43 **To:** Melissa Bury <[REDACTED]> > **Cc:**
Whittle, Clare <[REDACTED]> Whittaker, Suzanne
<[REDACTED]>; Steve Hoyland <[REDACTED]> Lee
Atkinson <[REDACTED]>
Subject: RE: Wednesday 22nd

Hi Melissa

Thanks for sending this information through. Can I just clarify that the plan is queue people on the public highway/pavement ?

Regards
Nicola

Nicola Duckworth
Team Leader Environmental Health (Safety at Sports Grounds Lead)
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From: Melissa Bury [redacted]
Sent: 21 September 2021 16:13 **To:** Duckworth, Nicola [redacted] > **Cc:**
Whittle, Clare <[redacted]> Whittaker, Suzanne
<[redacted]>; Steve Hoyland [redacted] >; Lee
Atkinson <[redacted]>
Subject: RE: Wednesday 22nd

Good afternoon,

Alongside our event plan we have the following crowd management measures in place to mitigate the increased footfall due to the match at Old Trafford.

Please see attached for event plan and enhanced security deployment, the outside positions highlighted in yellow.

1. Pedestrian barrier from the side gate to E3 ensuring the path is shared between our queue and public/Man United ingress.
2. Increased external front gate team in place
3. Static stewarding along the pedestrian barrier line proactively and vocally managing the queue. All briefed to engage with the public and asking for tickets to be ready for scanning and proof of Covid protocols ready for viewing ahead of entry
4. Enhanced security booked on in the form of 1 supervisor and 3 SIA to be an external mobile queue control to actively move up and down Trafford Wharf and be proactive in managing the above stewarding on the pavement. They will be advising match goers to be careful on the road.
5. We will work with production to open the venue earlier than the advertised door times.
6. Activity on our socials and via GMPTE ensuring clear messaging for the attendees.

This event is a low risk event with minimal to moderate alcohol consumption. They are a co operative crowd who will listen to instruction.

Kind regards,
Mel

From: Melissa Bury

Sent: 21 September 2021 15:16

To: Duckworth, [REDACTED] > **Cc:** Whittle, Clare
<[REDACTED] Whittaker, Suzanne <[REDACTED]

Subject: RE: Wednesday 22nd

Hi Nicola,

Of course, I'll have one over to you shortly.

Kind regards,
Mel

From: Duckworth, Nicola <[REDACTED]

Sent: 21 September 2021 13:25

To: Melissa Bury <[REDACTED] **Cc:** Whittle, Clare
<[REDACTED] Whittaker, Suzanne <[REDACTED]

Subject: FW: Wednesday 22nd **Importance:** High

Hi Melissa

I have received an out of office from lee are you able to respond ?

Regards

Nicola Duckworth

Team Leader Environmental Health (Safety at Sports Grounds Lead)

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From: Duckworth, Nicola
Sent: 21 September 2021 13:24
To: 'Lee Atkinson' <[redacted]> **Cc:** Whittle, Clare
<[redacted]> **Subject:** Wednesday 22nd

Hi lee

Further to your email in relation to you not being able to use the Man Utd car park for this event, please could you provide your crowd management plan, prior to this event. As you are aware we have concerns in relation to queuing on the roads and pavements outside the venue.

Regards
Nicola Duckworth
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