

**High Road West Hybrid Planning Application (reference HGY/2021/3175) (“the High Road West Application”)**

Mr Philip Elliot  
London Borough of Haringey

Philip

I writer in response to the letter of July 20<sup>th</sup> received from Richard Max&Co. Solicitors written on behalf of their client THFC.

The plethora of detail provided in this letter reflects the difficulty in addressing matters of this nature. To adopt 'safety' as the focus is too general whereas 'level of risk' I would consider to be more definitive. The nature of a hazard allows the level of risk to be determined.

The question one would ask concerning the issue would be

Do the proposals (construction phase and finality) expose spectators/employees/members of the public to a greater level of risk than what is currently in place?

1. Crowd flow and Safety

- 1.1 The exchange of information between Movement Strategies and Buro Happold needs to be improved.
- 1.2 Is it the opinion that THFC has been advised by their consultants that the current Crowd Flow Study is inadequate?
- 1.3 The management plan for any event has to provide contingency measures should WHLS be closed. As demonstrated in the extensive advice given to ticketholders for the recent Guns and Roses concert there are a number of alternative transport choices.
- 1.4,1.5,1.6 The similarity of the two schemes for access are clear. The interpretation of the content here raises a question as to whether the current procedures are satisfactory.
- 1.7 The management procedures currently in place would equally apply. The quantum of space is simply one link in the egress chain. Whilst, in my opinion, current management procedures could be improved, the evidence to date does not indicate the procedures to allow unacceptable levels of risk to occur.
- 1.9 My understanding is that measures to ensure acceptable levels of risk during each phase of the construction will be assessed by the Safety Advisory Group. This is no different that the common practice of Local Authorities throughout the country when licensing events.
- 1.10 My understanding is that this matter has been recognised and addressed.
- 1.11 Understood that discussions between BH and the concerned party have resolved this matter.
- 1.13 It is understood that closer interpretation of drawings discounts the argument presented here. As an engineer I must take exception to the adoption of generalised wording such as *far greater space is likely to be required* which does not properly inform.

- 1.14,1.15 Avoids acceptance as to the credibility of the Safety Advisory Group in providing advice to members.
- 1.16 There is sufficient evidence if the limitations of current data are properly interpreted and conservative design measures are adopted.
- 1.17 A valid point the significance of which is diminished by hyperbole.
- 1.18 Strictly interpreted correct but a failure to recognise that the Stress Test provides an ‘umbrella’ that covers concerts. It is of note that concerts were examined in the Movement Strategies document *Design Parameters Station-Stadium Link*.
- 1.19 Misreporting that demonstrates a lack of understanding as to relevance. Failure to understand the design process.
- 1.20 Nonsensical in that the event management plan has to provide measures to prevent a queue of this size. As previously reported the measures adopted to prevent excessive queuing during recent train problems affecting WHLS were successful.
- 1.21,1.22 Uncertain as to what is implied here.
- 1.23,1.24 Unable to comment as to how this can be a legal requirement. Would only consider that definitive recognition as to what MUST be provided throughout the construction phases is defined and accepted by both parties. This should not be interpreted as vehicle to prolong discussion.
- 1.25 Access has to be provided. (It should be accepted that the stadium could operate to full capacity should for whatever reason WHLS be closed).
- 1.26 I have seen no analysis undertaken should WHLS be closed for any reason.
- 1.27 Unacceptable given that should the station be closed temporarily or permanently. Contingency measures necessarily form part of the event management plan. Station closure is effectively similar to lack of access.
- 1.28 Cannot comment as to the facts of the documents referred to.
- 1.29a The same claim could be made against technical analysis currently in place. Was sufficient data available to properly inform technical analysis relating to recent ‘irregular’ events given the doubling in capacity of the stadium. This lack of certainty is ever present in matters of this nature and the Safety Advisory Group carries the responsibility of appropriately addressing this.

Speaking generally differences of opinion will inevitably occur when commercial interests come into conflict. This, to my way of thinking, can pose a greater threat to spectator safety than the technical issues being examined here.

Dr J F Dickie  
July 21<sup>st</sup> 2022