

Applicant's Solicitor's communications with residents making representations

Ms Sarah Dunning (objection 1)

14.4.23 Response to email of 6 April

14.4.23 Response by Applicant's Solicitor, reply to that, and further response from Solicitor seeking to clarify the misunderstanding.

No further communication received from Ms Dunning (to whom emails of 21.4.23 and 25.4.23 were also sent)

Mr and Mrs Gurden (objection 2)

6.4.23 Full version of email sent to Mr and Mrs Gurden.

No further communication received from Mr and Mrs Gurden (to whom emails of 21.4.23 and 25.4.23 were also sent)

Ms Heather Williams (objection 3)

No response to emails of 6.4.23; 21.4.23 or 25.4.23

Simon Criswick (objection 4)

19.4.23 Response to email of 6 April advising of intention not to pursue the matter at this time and Solicitor's response.

Cllr Williams (objection 5)

25.4.23 Response to email reducing application to one event

25.4.23 Email (also sent to each of the other residents concerned) advising of Amendment of application to one event pa and attaching NMP

21.4.23 Response to email inviting a discussion with Mr Arjomand

21.4.23 Email (also sent to each of the other residents concerned) inviting Them to speak with Boxer's Event Director, Mr Baz Armomand.

9.4.23 Response to email of 6 April (with conditions in blue referred to in response email of 21.4.23)

From: julia.palmer@jcplaw.co.uk
Sent: 14 April 2023 17:48
To: 'Sarah Dunning'
Subject: RE: AFC Bournemouth Variation application : Council ref MAU 205631

Hello again.

I must apologise for having apparently failed to explain exactly what the Club is proposing here, which appears to have given rise to your very understandable concerns.

Just to clarify the application, the reference to the 'small events' relates only to any boxing or wrestling that may be hosted on site, and not to general entertainment. These small boxing or wrestling events would be held in the venue itself, rather than using external/pitch areas, so should not give rise to the issues that concern you when the pitch is being used. It is unlikely that there would be more than a half a dozen such events a year.

I do hope that allays your concerns in this particular respect.

Kind regards

Julia Palmer
JCP Law

From: Sarah Dunning [REDACTED]
Sent: Friday, April 14, 2023 3:06 PM
To: julia.palmer@jcplaw.co.uk
Subject: RE: AFC Bournemouth Variation application : Council ref MAU 205631

Thanks for the prompt reply, Julia.

I'm more worried about the license providing the potential to extend event hours to midnight on any day of the week for any number of events for fewer than 500 people. I can live with a couple of large events per year but not the thought of potentially regular events for up to 499 people on any night of the week, with a beyond reasonable finish time for noise and light pollution. Limiting the request for events for 500+ people does not address this concern.

Thanks again,
Sarah

[Sent from Yahoo Mail on Android](#)

On Fri, Apr 14, 2023 at 9:26, julia.palmer@jcplaw.co.uk
<julia.palmer@jcplaw.co.uk> wrote:

Good morning, and thank you for the courtesy of responding to my email.

1

julia.palmer@jcplaw.co.uk

From: julia.palmer@jcplaw.co.uk
Sent: 14 April 2023 09:27
To: 'Sarah Dunning'
Subject: RE: AFC Bournemouth Variation application : Council ref MAU 205631

Good morning, and thank you for the courtesy of responding to my email.

There is an Acoustic Consultant employed to ensure acceptable attenuation of, amongst other things, noise from microphone use, and we will arrange for further information which will hopefully put your mind at rest to be forwarded to you shortly in this respect.

In the meantime, the Club is most certainly not proposing to host such events throughout the year, and has limited the number of such events to a maximum of **3 a year**. This limitation is in the amended application (which was originally for a maximum of 4 a year) before the Council.

Kind regards

Julia Palmer
JCP Law

From: Sarah Dunning
Sent: Friday, April 14, 2023 8:01 AM
To: julia.palmer@jcplaw.co.uk
Cc: 'Sarah Rogers - Licensing' <sarah.rogers@bcpcouncil.gov.uk>
Subject: Re: AFC Bournemouth Variation application : Council ref MAU 205631

Thank you for your reply, Julia, which was thorough and well-worded. It didn't, however, reassure me sufficiently to want to withdraw my objection. I can hear microphone noise from the stadium when they are in use, and the thought of a microphone potentially keeping my family and me awake until 11.30 at night any night of the week is very concerning.

If the application is primarily to host one match, why would you not apply for a one-off licence, or for one for maximum 4 events per year? You are asking for a great deal of leeway to extend AFCB's event offering to any evening, beyond many people's bed times, and whilst I do not object to a few late events per year, I do object to enabling the possibility of regular, more frequent, even if slightly smaller, events.

Best regards,
Sarah Dunning

[Sent from Yahoo Mail on Android](#)

On Thu, Apr 6, 2023 at 15:10, julia.palmer@jcplaw.co.uk
<julia.palmer@jcplaw.co.uk> wrote:

julia.palmer@jcplaw.co.uk

From: julia.palmer@jcplaw.co.uk
Sent: 21 April 2023 17:01
To: [REDACTED]
Cc: 'Sarah Rogers - Licensing'
Subject: AFC Bournemouth Licence Variation Application

Importance: High

Good afternoon, Mr and Mrs Gurden.

Further to my email of 6 April, with their very extensive experience of conducting high profile boxing matches of this nature, the team at Boxxer (the promoter Company) is very clear that this boxing event will be operated and controlled to the very highest of standards to, amongst other things, allay the public nuisance concerns you may still have. This includes the engagement of an Acoustic Consultant to prepare a Noise Management Plan, the final details of which are being agreed with the Environmental Health Team at this time. I will arrange for the finalised version to be forwarded to you in advance of the public hearing on Friday.

The Event Director for Boxxer, Mr Baz Arjomand, is very keen to reassure you of his Company's commitment to the prevention of public nuisance to those living in the area. To this end, he is most willing to speak with you direct to better explain the ethos of the whole event and his Company's role in it, and to let you question him on this prior to the public hearing. That could be by Teams, telephone or possibly a face to face meeting if a suitable time and date can be arranged.

Would this offer be of interest to you?

If it is, could you kindly let me know at the earliest opportunity so that we can put the appropriate arrangements for that in hand. I should add that Mr Arjomand's wife is due to give birth later next week, so if you could please consider some dates early in the week for the discussion, that would be most helpful.

Kind regards

Julia Palmer
JCP Law

[REDACTED]
www.jcplaw.co.uk

registered as a sole practitioner with, and authorised and regulated by, the Solicitors Regulation Authority: Registration no 449520: www.sra.org.uk/solicitors/code-of-conduct.page

This email and its attachments are intended for the above named only and may be confidential. If they have come to you in error you must take no action based on them, nor must you copy or show them to anyone. Please reply to this email and highlight the error. Email transmission cannot be guaranteed to be secure or error free. The sender does not accept any liability for any errors or omissions arising as a result of transmission.

Your privacy will always be treated with the utmost respect. Please email me if you would like a copy of JCP Law's Privacy Policy.

Please be aware of Cybercrime. If you receive an email purporting to be from JCP Law which seeks to direct a payment to bank details which differ from those which I have already given you (in my letter of engagement and/or invoices) it is unlikely to be genuine. Please do not reply to the email nor act on any information contained in it, but contact me straight away.

julia.palmer@jcplaw.co.uk

From: julia.palmer@jcplaw.co.uk
Sent: 19 April 2023 17:09
To: [REDACTED]
Cc: 'Sarah Rogers - Licensing'
Subject: RE: AFC Bournemouth Variation application: council ref MAU 205631

Good afternoon, Mr Criswick, and thank you for your kind courtesy in advising us of your decision, for which my clients and I are grateful.

With all the steps that are being put in place, my clients very much hope that there will be no necessity for you to do so, but if you do have any feedback from the event, do please let us know.

Kind regards

Julia Palmer
JCP Law
[REDACTED]

From: [REDACTED]
Sent: Wednesday, April 19, 2023 11:42 AM
To: julia.palmer@jcplaw.co.uk
Subject: Re: AFC Bournemouth Variation application: council ref MAU 205631

Dear Julia

Thank you for the information you sent me. Please be advised that I have informed Mrs Rogers that I do not intend to pursue this matter any further at this time. I think it remains to be seen what actual impacts these events will have on the local residents, but for my part, I do not wish to attend the hearing.

Yours faithfully

Simon Criswick

19/4/23

julia.palmer@jcplaw.co.uk

From: Councillor Lawrence Williams <lawrence.williams@bcpcouncil.gov.uk>
Sent: 25 April 2023 16:40
To: julia.palmer@jcplaw.co.uk
Cc: [REDACTED]
Subject: RE: AFC Bournemouth Variation application

Dear Ms Palmer

Thank you for your latest email.

I agree that this shows willing, but as I have said repeatedly 11.30 is too late to finish serving and selling alcohol and far too late for music. 10pm is a reasonable offer.

I appreciate what your client has done thus far but we are still sticking on those two final points.
Regards

Lawrence Williams
Ward Councillor for Littledown & Iford
Chair Corporate & Community O & S Committee
BCP Arts Champion



CONFIDENTIALITY STATEMENT: This email and any files transmitted with it may be confidential, legally privileged and protected in law and are intended solely for the use of the individual to whom it is addressed. The copyright in all documentation is the property of BCP Council (Bournemouth, Christchurch and Poole Council) and this email and any documentation must not be copied or used other than as strictly necessary for the purpose of this email, without prior written consent which may be subject to conditions. Any view or opinions presented are solely those of the author and do not necessarily represent those of BCP Council. BCP Council reserves the right to inspect incoming and outgoing emails. If you have received this email in error, please contact the sender by return and confirm that its contents have been destroyed.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please notify the system manager. This footnote also confirms that this email message has been checked for the presence of computer viruses.

From: julia.palmer@jcplaw.co.uk <julia.palmer@jcplaw.co.uk>
Sent: Tuesday, April 25, 2023 4:26 PM
To: Councillor Lawrence Williams <lawrence.williams@bcpcouncil.gov.uk>
Cc: [REDACTED]

<sarah.rogers@bcpcouncil.gov.uk>

Subject: AFC Bournemouth Variation application
Importance: High

Good afternoon.

From: julia.palmer@jcplaw.co.uk
Sent: 25 April 2023 16:26
To: 'Councillor Lawrence Williams'
Cc: [REDACTED]
Subject: AFC Bournemouth Variation application
Attachments: Application and conditions one event.docx; NMP- BOXXER Bournemouth AFC.pdf
Importance: High

Good afternoon.

Thank you for your email of 21 April. Whilst my client remains confident that your fears of experiencing public nuisance from this event at the Vitality Stadium will not materialise because of the extensive measures they will be putting in place, they also remain very keen to try and continue to work with you, and the residents in their vicinity.

To this end, and to go some way towards meeting with your requests, they are willing to alter the application so that it will only be for **one boxing event** this year.

I am attaching the amended application details, together with the consequential amendments to the conditions offered, which are being filed with the Council for the Hearing.

As promised, I also attach the Noise Management Plan, to support the confidence my client expresses in the first paragraph of this email.

With kind regards

Julia Palmer
JCP Law

[REDACTED]
www.jcplaw.co.uk

registered as a sole practitioner with, and authorised and regulated by, the Solicitors Regulation Authority: Registration no 449520: www.sra.org.uk/solicitors/code-of-conduct.page

This email and its attachments are intended for the above named only and may be confidential. If they have come to you in error you must take no action based on them, nor must you copy or show them to anyone. Please reply to this email and highlight the error. Email transmission cannot be guaranteed to be secure or error free. The sender does not accept any liability for any errors or omissions arising as a result of transmission.

Your privacy will always be treated with the utmost respect. Please email me if you would like a copy of JCP Law's Privacy Policy.

Please be aware of Cybercrime. If you receive an email purporting to be from JCP Law which seeks to direct a payment to bank details which differ from those which I have already given you (in my letter of engagement and/or invoices) it is unlikely to be genuine. Please do not reply to the email nor act on any information contained in it, but contact me straight away.

From: Councillor Lawrence Williams <lawrence.williams@bcpcouncil.gov.uk>
Sent: 21 April 2023 17:08
To: julia.palmer@jcplaw.co.uk
Cc: Sarah Rogers - Licensing
Subject: RE: AFC Bournemouth Variation application : council ref MAU 205631

Dear Ms Palmer

I am more than happy to speak with your client, but on the understanding that the areas below further highlighted in Blue are accepted as conditions.

Regards

Lawrence Williams
Ward Councillor for Littledown & Iford
Chair Corporate & Community O & S Committee
BCP Arts Champion



CONFIDENTIALITY STATEMENT: This email and any files transmitted with it may be confidential, legally privileged and protected in law and are intended solely for the use of the individual to whom it is addressed. The copyright in all documentation is the property of BCP Council (Bournemouth, Christchurch and Poole Council) and this email and any documentation must not be copied or used other than as strictly necessary for the purpose of this email, without prior written consent which may be subject to conditions. Any view or opinions presented are solely those of the author and do not necessarily represent those of BCP Council. BCP Council reserves the right to inspect incoming and outgoing emails. If you have received this email in error, please contact the sender by return and confirm that its contents have been destroyed.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please notify the system manager. This footnote also confirms that this email message has been checked for the presence of computer viruses.

From: julia.palmer@jcplaw.co.uk <julia.palmer@jcplaw.co.uk>
Sent: Friday, April 21, 2023 4:47 PM
To: Councillor Lawrence Williams <lawrence.williams@bcpcouncil.gov.uk>
Cc: Sarah Rogers - Licensing <sarah.rogers@bcpcouncil.gov.uk>
Subject: RE: AFC Bournemouth Variation application : council ref MAU 205631
Importance: High

Dear Cllr Williams

Thank you for your response, which has been considered with equal care.

With their very extensive experience of conducting high profile boxing matches of this nature, the team at Boxxer (the promoter Company) remains very clear that this boxing event will be operated and controlled to the very highest of standards to, amongst other things, allay the public nuisance concerns you have. This includes the engagement of an Acoustic Consultant to prepare a Noise Management Plan, the final details of which are being

agreed with the Environmental Health Team at this time. I will arrange for the finalised version to be forwarded to you in advance of the public hearing on Friday.

The Event Director for Boxxer, Mr Baz Arjomand, is very keen to reassure you of his Company's commitment to the prevention of public nuisance to those living in the area. To this end, he is most willing to speak with you direct to better explain the ethos of the whole event and his Company's role in it, and to let you question him on this prior to the public hearing. That could be by Teams, telephone or possibly a face to face meeting if a suitable time and date can be arranged.

Would this offer be of interest to you?

If it is, could you kindly let me know at the earliest opportunity so that we can put the appropriate arrangements for that in hand. I should add that Mr Arjomand's wife is due to give birth later next week, so if you could please consider some dates early in the week for the discussion, that would be most helpful.

Kind regards

Julia Palmer
JCP Law

From: Councillor Lawrence Williams <lawrence.williams@bcpcouncil.gov.uk>
Sent: Sunday, April 9, 2023 3:20 PM
To: julia.palmer@jcplaw.co.uk
Cc: Sarah Rogers - Licensing <sarah.rogers@bcpcouncil.gov.uk>; Councillor Bobbie Dove <bobbie.dove@bcpcouncil.gov.uk>
Subject: RE: AFC Bournemouth Variation application : council ref MAU 205631

Dear Ms Palmer

I promised to look at your email and its contents and have read it several times so as to not miss any nuances.

I am answering points below in red. I am willing to withdraw only if our suggestions are met.

Lawrence Williams
Ward Councillor for Littledown & Iford
Chair Corporate & Community O & S Committee
BCP Arts Champion



CONFIDENTIALITY STATEMENT: This email and any files transmitted with it may be confidential, legally privileged and protected in law and are intended solely for the use of the individual to whom it is addressed. The copyright in all documentation is the property of BCP Council (Bournemouth, Christchurch and Poole Council) and this email and any documentation must not be copied or used other than as strictly necessary for the purpose of this email, without prior written consent which may be subject to conditions. Any view or opinions presented are solely those of the author and do not necessarily represent those of BCP Council. BCP Council reserves the right to inspect incoming and outgoing emails. If you have received this email in error, please contact the sender by return and confirm that its contents have been destroyed.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please notify the system

manager. This footnote also confirms that this email message has been checked for the presence of computer viruses.

From: julia.palmer@jcplaw.co.uk <julia.palmer@jcplaw.co.uk>
Sent: Thursday, April 6, 2023 3:28 PM
To: Councillor Lawrence Williams <lawrence.williams@bcpcouncil.gov.uk>
Cc: Sarah Rogers - Licensing <sarah.rogers@bcpcouncil.gov.uk>
Subject: AFC Bournemouth Variation application : council ref MAU 205631

Good afternoon. Your email to Mrs Rogers has been forwarded to me as I am representing the Football Club in respect of the licence application.

May I just explain a little more about the prime reason for making the application, which is the inclusion of boxing and wrestling as a licensable activity. This is to enable the club to host the prestigious upcoming Boxing match on Saturday 27 May between local celebrity boxer, Chris Billam-Smith who is the Commonwealth and European Cruiserweight title holder, and Lawrence Okolie, the current WBO Cruiserweight Champion, which means that this is a World Title fight. That will obviously be popular, and the ring will be erected on the pitch itself to enable spectators to use the stand facilities etc. It will be what is described in the application as 'major event' because it will attract more than 500 spectators. That lesser number could be accommodated indoors for a smaller boxing or wrestling match. **Let's take the first Boxing event first. I understand that capacity could be as high as 14, 9999. This in itself will cause traffic and parking issues, something Littledown residents endure for the football season, making the season longer will not bode well with a majority of people living within walking distance of the ground, including myself. This is a bank holiday weekend and people will want to make full use of outdoor living and the noise from the stadium certainly in the area immediately around it and some distance from it will find the pitch noise loud and will carry. Boxing matches are not known to be quiet and refined events, and this will be made no easier with the sale of alcohol on the premises during the match times. People leaving early and others replacing them will cause further disruption to the local area.**

The use of microphones will be mainly for the introduction of the boxing matches, and the boxers will enter the arena to music, which will also be played between fights. **Why does there need to be music? It will add to the noise levels and is not necessary I can accept a fanfare on entering but a DJ and music is not something the would be acceptable to residents particularly if they are in their own gardens.** There will be no music played or microphone used (unless there is an emergency) after 11.30pm. **This is wholly unreasonable 10.00 would be almost acceptable not 11.30.**

The Club, the promoter, and the officers responsible for public safety, prevention of crime and disorder and prevention of public nuisance have been closely involved in the preparation for this match (and the other aspects of this application) to ensure that the impact of the proposals will not be harmful to those living in the area. Conditions will be imposed on the licence to ensure that close involvement continues throughout, and that the necessary protective steps are all in place. In particular, the Senior Environmental Health Officer for BCP Council has imposed strict conditions on the noise levels permitted, which the Club is confident will address your concerns about noise nuisance from the music or microphones at the boxing event. **How will this happen, once in place there is no way that the noise can be minimised, past experience of events in the park shows that despite promises and guarantees noise will travel. I have lived in the area for 42 years and remember well when AFC tried putting on Concerts in the ground it was a disaster, Elton John blasted out music for hours on end interspersed with obscenities I am no prude but at the time we had a young family and had to go inside to try and avoid it. I am not anti-boxing nor am I anti AFC Bournemouth I follow their progress, or not, every week and find that as a Premier division team they have a better quality of fans, we do not get nearly as many beer cans in the garden after a match as we used to. I do question the use of a football ground which is situated in the middle of a public park which in turn is situated in a established housing area which has been in existence over 100 years, longer than the current football club, for boxing and wrestling matches.**

I would agree to a one-off trial with conditions proposed i.e., no alcohol sale after 10 noise levels guaranteed to acceptable levels. Parking restrictions in place for the event and finally to question what wet weather provision is there? We could then revue this after the match, rather than such a flexible license being issued.

The boxing event will start at around 4pm and there will be several matches during the evening, with the main event scheduled for about 9.30-10pm. It is unlikely that everyone will stay until the end, with a proportion of spectators leaving after the particular bout they came to watch. Unlike football, therefore, there is unlikely to be a mass exodus

at the end, but a far more gradual departure over the course of the evening. With the Club's extensive experience in controlling people both coming and leaving, they are sure that they will be able to clear the ground by midnight. **Far too late, and they have no experience controlling boxing spectators.** Entrance to the boxing event will be by ticket only. Ticket purchasers will be given an Information Pack which will include transport and parking guidance. The Pack will include a notice that on leaving, spectators should have regard for those living in the area, and leave quietly. The draft Transportation Plan proposes requesting that BCP change the priorities of the traffic lights at Ashley Road to ensure a swifter clearance of vehicles, and arrangements with local bus and taxi services. It is also confirmed that the newly installed cycle lanes in Kings Park are fully lit so safe to use at night, and that there are bike racks available. There will be no alcohol sold after 11pm. **I can't see changing the priority is going to make much difference it usually ends up inconveniencing residents as they often forget to change back the priority.**

Having regard to the above and the strict controls, together with the conditions on the licence, the Club has every confidence that, on the maximum of 3 occasions a year that such an event may be held, it will not cause an unacceptable disturbance or sleep disruption to you or children living in the area. **I cannot see how you come to that conclusion.**

If you have any other questions please do not hesitate to contact me, but the Club very much hopes that the information in this email will address your concerns, and enable you to kindly withdraw your representation.

Kind regards

Julia Palmer
JCP Law

www.jcplaw.co.uk

registered as a sole practitioner with, and authorised and regulated by, the Solicitors Regulation Authority: Registration no 449520: www.sra.org.uk/solicitors/code-of-conduct.page

This email and its attachments are intended for the above named only and may be confidential. If they have come to you in error you must take no action based on them, nor must you copy or show them to anyone. Please reply to this email and highlight the error. Email transmission cannot be guaranteed to be secure or error free. The sender does not accept any liability for any errors or omissions arising as a result of transmission.

Your privacy will always be treated with the utmost respect. Please email me if you would like a copy of JCP Law's Privacy Policy.

Please be aware of Cybercrime. If you receive an email purporting to be from JCP Law which seeks to direct a payment to bank details which differ from those which I have already given you (in my letter of engagement and/or invoices) it is unlikely to be genuine. Please do not reply to the email nor act on any information contained in it, but contact me straight away.

DISCLAIMER: This email and any files transmitted with it may be confidential, legally privileged and protected in law and are intended solely for the use of the individual to whom it is addressed. The copyright in all documentation is the property of BCP Council (Bournemouth, Christchurch and Poole Council) and this email and any documentation must not be copied or used other than as strictly necessary for the purpose of this email, without prior written consent which may be subject to conditions. Any view or opinions presented are solely those of the author and do not necessarily represent those of BCP Council. BCP Council reserves the right to inspect incoming and outgoing emails. If you have received this email in error please contact the sender by return and confirm that its contents have been destroyed. ***** This

email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager. This footnote also confirms that this email message has been checked for the presence of computer viruses.

DISCLAIMER: This email and any files transmitted with it may be confidential, legally privileged and protected in law and are intended solely for the use of the individual to whom it is addressed. The copyright in all documentation is the property of BCP Council (Bournemouth, Christchurch and Poole Council) and this email and any documentation must not be copied or used other than as strictly necessary for the purpose of this email, without prior written consent which may be subject to conditions. Any view or opinions presented are solely those of the author and do not necessarily represent those of BCP Council. BCP Council reserves the right to inspect incoming and outgoing emails. If you have received this email in error please contact the sender by return and confirm that its contents