

SRU/243861

FORM J



LICENSING ACT 2003

**APPLICATION FOR THE REVIEW
OF A PREMISES LICENCE OR
CLUB PREMISES CERTIFICATE**

NOTIFICATION

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Completed forms should be returned to:

Environmental Health Manager (Commercial)

Torbay Council

Community Safety

C/O Torquay Town Hall

Castle Circus

Torquay

TQ1 3DR

Contact Details:

Tel: 01803 208025

Web: www.torbay.gov.uk

Email: licensing@torbay.gov.uk

Application for the review of a premises licence or club premises certificate under the Licensing Act 2003

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

Before completing this form please read the guidance notes at the end of the form. If you are completing this form by hand please write legibly in block capitals. In all cases ensure that your answers are inside the boxes and written in black ink. Use additional sheets if necessary.

You may wish to keep a copy of the completed form for your records.

I Superintendent Matthew LAWLER, Head of Prevention Department, Devon and Cornwall Police
(Insert name of applicant)

apply for the review of a premises licence under section 51 / apply for the review of a club premises certificate under section 87 of the Licensing Act 2003 for the premises described in Part 1 below (delete as applicable)

Part 1 – Premises or club premises details

Postal address of premises or, if none, ordnance survey map reference or description Off Licence TQ Ltd 15 Lucius Street	
Post town Torquay	Post code (if known) TQ2 5UW

Name of premises licence holder or club holding club premises certificate (if known) Off Licence TQ Ltd

Number of premises licence or club premises certificate (if known) PL0969

Part 2 - Applicant details

I am Please tick ✓ yes

- 1) an individual, body or business which is not a responsible authority
 (please read guidance note 1, and complete [A] or [B] below)
- 2) a responsible authority (please complete [C] below)
- 3) a member of the club to which this application relates
 (please complete (A) below)

(A) DETAILS OF INDIVIDUAL APPLICANT (fill in as applicable)

Please tick ✓ yes

Mr Mrs Miss Ms Other title
(for example, Rev)

Surname

First names

I am 18 years old or over

Please tick ✓ yes

**Current postal
address if
different from
premises
address**

Post town

Post Code

Daytime contact telephone number

**E-mail address
(optional)**

(B) DETAILS OF OTHER APPLICANT

Name and address

Telephone number (if any)

E-mail address (optional)

(C) DETAILS OF RESPONSIBLE AUTHORITY APPLICANT

Name and address Devon and Cornwall Police Police Headquarters Middlemoor EXETER Devon EX2 7HQ
Telephone number (if any) 01803 218900
E-mail address (optional) Julie.smart@devonandcornwall.pnn.police.uk

This application to review relates to the following licensing objective(s)

	Please tick one or more boxes ✓
1) the prevention of crime and disorder	X
2) public safety	
3) the prevention of public nuisance	X
4) the protection of children from harm	X

Please state the ground(s) for review (please read guidance note 2)

- 1) The premises sells cans of lager/beer/cider with an abv of 7.5% and 9%, and 3 litre bottles of strong ciders, such as Omega cider at 7.5% abv and Frosty Jacks cider also at 7.5% abv. In respect of cans, customers are able to purchase single cans of these high strength products. Within Torquay there is a problem with 'street drinkers' purchasing these types of products and consuming them within public areas. This premises is situated in Lucius Street, about 100 metres from the Church of St Andrew, which is located at the junction of Lucius Street and Tor Church Road. Residents who live near this church have experienced anti-social behaviour and nuisance caused by 'street drinkers', who use the church yard to consume alcohol. There is evidence to suggest that these street drinkers are obtaining their alcohol from Off Licence TQ Ltd.
- 2) The police have received intelligence that this premises is receiving stolen goods. The level of intelligence was such that the Magistrates granted a Search Warrant under Section 28 of the Theft Act, and this warrant was executed on 4 January 2018. During this warrant the below items were seized from the premises:
Various items of childrens clothing - believed to be stolen.
A canister of what appeared to be CS gas.
50 bottles of spirits that did not have a UK Duty Paid stamp.
- 3) Whilst the search was taking place officers noticed a cut off pool or snooker cue, with silver tape thereon, positioned behind the counter.
- 4) The premises failed a test purchase operation in June 2015. In July 2016 a member of Torbay Council Licensing Team carried out an inspection and found that a licence condition in relation to the maintenance of a refusals record was not being complied with. This condition was again not being complied with at the time of a visit to the premises by Mrs Smart and Mrs Guy on 5 July 2017. On 25 July 2017 officers from Torbay Council Trading Standards Team carried out a "mystery shopping exercise" at the premises, whereby a 21 year old female was requested to

purchase alcohol to determine whether staff would request ID. The staff sold alcohol without asking for ID.

- 5) Tobacco that could not be sold legally in the UK was discovered in the premises in October 2015.

Please provide as much information as possible to support the application (please read guidance note 3)

In September 2014 the Premises Licence for this premises was transferred to Off Licence TQ Ltd and Miss Iwona Elzbieta Mankowska was nominated as the Designated Premises Supervisor. A search of Companies House shows that Off Licence TQ Ltd was incorporated on 10 September 2014 with Miss Iwona Elzbieta Mankowska being both the sole director and secretary.

On 12 June 2015 this premises was visited by two underage volunteers, acting on behalf of Torbay Council Trading Standards, who were able to purchase two bottles of cider without being asked for any identification. On 25 June 2015 Mr Keith Totham, Torbay Council Trading Standards Officer, wrote to Miss Mankowska requesting her attendance at the offices of Torbay Council in order that a PACE interview could take place. A copy of this letter is attached.

In July 2015 Mrs Smart was advised by one of Torbay Council's Street Wardens that the street drinkers had been seen with Polish cans of beer/lager/cider with an abv of 9%.

On 24 July 2015 Special Constables Rowe and Munford visited Off Licence TQ Ltd to carry out a licensing inspection. Whilst at the premises they noted two brands of Polish beer were available for sale and both of these had an abv of 7.5%. They did not see any beer/cider/lager with an abv of 9%. My Police Licensing Officer, Mrs Julie Smart, subsequently sent an email to Mrs Mandy Guy of Torbay Council Licensing Team, requesting that she advise the Street Wardens of the types of alcohol found at this premises.

On 25 August 2015 Miss Mankowska was written to by Mr Totham regarding the test purchase operation that had taken place on 12 June 2015. On this occasion he outlined that he wished for Miss Mankowska, on behalf of Off Licence TQ Ltd, to apply for a minor variation to add two conditions to the Premises Licence concerning the company engaging the services of a test purchase company to carry out 3 test purchases within a 12 month period. A copy of this letter is attached.

On 22 October 2015 Miss Mankowska, on behalf of Off Licence TQ Ltd, applied for the minor variation outlined above, which was granted at the end of the representation period.

On 18 November 2015 Mr Totham again wrote to Miss Mankowska of Off Licence TQ Ltd. This letter related to a visit to the premises on 20 October 2015, following the receipt of information that the premises were selling illegal tobacco. On this occasion a sniffer dog was utilised, and this dog located nine 50g packs of Golden Virginia hand-rolling tobacco and 6 packs of 20 L&M cigarettes. As the statutory health warnings were not in English these items could not be legally sold or supplied in the UK. Mr Totham again requested that Miss Mankowska attend Torbay Council for a PACE interview on Wednesday 3 December 2015. A copy of this letter is also attached. As a result of this interview, Mrs Smart has been advised that no further action was taken in relation to this matter.

On 20 May 2016 Mrs Smart was contacted by Mr Shaun Rackley of the Torbay Council Licensing Team. He advised her that Off Licence TQ Ltd wished to apply for a variation to allow the sale of alcohol from 8.00 am daily, instead of 10.00 am daily, and he forwarded her a copy of a draft application form. Mr Rackley requested that Mrs Smart advise him of any conditions that the police would seek prior to the following Tuesday, 24 May 2016, so that he could relay these to Miss Mankowska when he met with her.

On Tuesday 24 May 2016 Mr Rackley attended Off Licence TQ Ltd. At that time he discussed the current Premises Licence conditions with Miss Mankowska and identified that all the conditions were being adhered to except one, which was pointed out to her. This condition was within Annexe 2, The Protection of Children from Harm and stated "A register shall be kept up to date, to identify any persons refused alcohol or tobacco". During this visit Mr Rackley also identified that Miss Mankowska had not undertaken a fire risk assessment.

As a result of Mr Rackley's visit, he wrote to Miss Mankowska on 25 May 2016 advising her of the

breach of condition and offering her advice. A copy of this letter is attached for your information.

Following this visit, Mr Rackley contacted Mrs Smart and advised her that whilst he was at the premises a couple of people who looked like street drinkers, and who were obviously under the influence of alcohol, came in and purchased alcohol whilst he was talking to Miss Mankowska. After these persons left the shop he advised Miss Mankowska that these males should not have been served. After leaving the premises he saw these individuals drinking alcohol on a bench at the end of the road.

Mr Rackley also advised Mrs Smart that he had had discussions with PCSO Bradley Williams, a former employee of the Torbay Council Licensing Team, in relation to this premises. PCSO Williams informed Mr Rackley that he frequently had to deal with street drinkers who were causing issues in a churchyard at the end of Lucius Street.

As a result of that information, Mrs Smart discussed the matter with PCSO Williams and he subsequently provided her with a statement outlining complaints he had received and issues he was experiencing with street drinkers in the churchyard of The Greek Orthodox Church of St Andrews. A copy of this statement is attached.

During the afternoon of Thursday 26 May 2016 Mrs Smart and Mr Rackley attended St Efrides Church (Bampfylde Road, Torquay), St Andrews Church (just off Lucius Street, Torquay) and other licensed premises in the area to identify the types of beer/cider/lager being sold at these premises and to see if there were any discarded bottles or cans in either of the church grounds. Details of the types of alcohol sold at these off licences were recorded by Mrs Smart and logged on the Licensing computer system. It was noted that none of the other licensed premises in the area stocked any Polish beer/cider/lager.

In respect of St Efrides Church they found empty cans of 5% Lech, Czar vodka bottles and Skopian.

In respect of St Andrews Church they did not see any discarded cans but a male groundsman was in attendance cutting the grass so he may have already picked up any rubbish.

Following the above visits Mrs Smart and Mr Rackley attended Off Licence TQ Ltd. Mrs Smart advised Miss Mankowska that the police would object to any variation of hours at her premises and should she submit an application Mrs Smart indicated that the police would seek conditions prohibiting the sale of beer/cider/lager with an abv of more than 6% and no single cans. Miss Mankowska was not happy with this, but said that she would not continue with her application.

Whilst at the premises Mrs Smart noted the below items of stock:

Debowe 7.0%
Warka 5.5%
Perla 7.6%
Tatra 7.0%
Okocin 5.5% and 7.0%
Zubr 6.0%
Tyskia 5.5%
Karpackie 9.0%
Strong Dwuselodowy 6.5%
K 8.4%
Special Brew 9.0%
Omega 7.5% at 89p per can
Barnstormer 7.5%

On 31 July 2016 Mrs Smart received a report from PCSO Graham who was investigating an incident involving the use of a stolen credit card by 2 individuals at Off Licence TQ Ltd. As the CCTV system at the premises did not use disks, PCSO Graham had provided the premises with a memory stick to download the relevant footage. PCSO Graham visited the premises on 27 July, 28 July, and 29 July to try to collect the CCTV but on each occasion she was told that it had not been downloaded. On 29 July PCSO Graham told the staff that the footage needed to be ready for collection on 31 July and that she would be in to collect it on that date. However on that day she was again told that the manager had still

not burnt it off and the manager was not working on that day. PCSO Graham was conscious that the footage would automatically delete on 2 August 2016 and was concerned that the evidence needed for her investigation would be lost. PCSO Graham felt that the premises were delaying her request and thus she would not be able to pursue the crime complaint.

Mrs Smart spoke to Miss Mankowska regarding this matter and requested that she provide the CCTV immediately. Miss Mankowska subsequently downloaded the CCTV and PCSO Graham was able to collect it. As a result of this issue, a letter was sent to Off Licence TQ Ltd and Miss Mankowska, advising them of the need to ensure that CCTV is downloaded at the earliest opportunity. A copy of this letter is attached.

On 2 June 2017 Mrs Smart received a report from PCSO Graham/PC Moore who indicated that they had received information from a member of the public that P & K, Lucius Street, Torquay were selling alcohol imported from Poland without paying the UK duty tax. They had also received complaints from residents that P & K were selling single cans to customers, including street drinkers, which was causing problems in the community. The officers indicated that they had stopped checked local known persons drinking in the nearby churchyard who confirmed that they had purchased their can of Desperado from P & K.

On receiving this report, Mrs Smart formed the opinion that this information was in relation to Off Licence TQ Ltd. A search of the Torbay Council Licensing Public Register showed that prior to September 2014 this premises had been called P & K.

On 14 June 2017 Mrs Smart received an email from Mrs Mandy Guy in which she raised concerns that a local resident was experiencing anti-social behaviour in St Andrews Churchyard.

On 3 July 2017 Mrs Smart carried out some research on our Storm computer system and this showed a large number of logs in relation to drunkenness/ASB/scuffles in St Andrews Churchyard and it was apparent that the residents were getting very stressed with the situation. A document giving details of all logs recorded by the police for St Andrews Church in 2017 is attached for your information.

On 11.30 am 5 July 2017 Mrs Smart and Mrs Guy attended Off Licence TQ Ltd. On arrival a female called Trish (later discovered to be Miss Mankowska's daughter) was the only member of staff on duty. She rang Miss Mankowska who subsequently attended the premises, together with her partner Pete. Whilst inside the premises Mrs Smart noticed large quantities of beers/ciders/lager stacked up on the floor and within 3 different fridges. Mrs Smart also noted that whilst they were in the shop at least 5 men came in, all separately, and each of them purchased individual cans in quantities of 1, 2 or 3's, with only one male purchasing a multi-pack. These persons did not buy any other items.

Mrs Guy ran through the conditions of the licence and the premises compliance with these was checked. It was established that the premises were breaching a number of these conditions in relation to the name of the DPS not being displayed on the window, no refusals book and all deliveries not taking place during the day time (Miss Mankowska admitted that some deliveries take place at 10.00 pm at the latest). It was also noted that most cans of drink are sold in single cans or multiples and the strongest types at that time were 7.0% or 7.6%. At this time Trish, Miss Mankowska and Pete were adamant that they do not sell to drunks or to the street drinkers and there were lengthy discussions re this matter.

Whilst in the premises Mrs Smart took numerous photographs showing the different brands of beer/cider/lager available in the shop.

Whilst in the shop a male wearing a cap and blue T shirt with white writing on it, purchased a single can of alcohol (brand not known). Mrs Smart heard Pete say to this male "Hi Kev, you are not going to drink that on the bench are you?" This male said "No I don't drink there now, I have my own special place I go to".

After leaving the premises Mrs Smart and Mrs Guy went to St Andrews Churchyard where they noticed 4 people sat chatting, but they could not see any alcohol. On looking in the bins they saw a number of

cans which were all called Perla Mocna. Mrs Smart took a photograph of one of these cans. They also noticed 2 empty cans of Fosters next to a grave.

Whilst Mrs Smart and Mrs Guy were stood chatting in the graveyard a male's head popped up from behind a gravestone. Mrs Smart and Mrs Guy watched as this male got up and Mrs Smart noticed that it was the same male, wearing a blue T shirt, who had purchased a single can from Off Licence TQ Ltd. He picked up a can, which he scrunched in his hand and he then left the area.

Mrs Smart noted that the cans of Perla Mocna seen in the bin are sold in Off Licence TQ Ltd. This beer has an abv of 7.6%.

On Monday 10 July 2017 Mrs Smart received a phone call from Miss Mankowska who indicated that when she attended her premises that morning in order to open there were already people sat drinking alcohol on the bench at the end of the road. Mrs Smart advised her that it is likely that these individuals are also obtaining alcohol from other licensed premises in the area and informed her that she will take positive action wherever there is a link to a specific premises. Miss Mankowska was informed of Mrs Smart's observations regarding the male in the blue T shirt who had consumed his can of drink in the churchyard and the fact that Perla Mocna cans were seen in the bin, with her premises being the only off licence in that area selling that particular product.

On 21 July 2017 a letter was sent to Off Licence TQ Ltd in relation to Mrs Smart and Mrs Guy's visit to the premises on 5 July 2017. Within this letter I requested that the premises cease the sale of single cans immediately. A copy of this letter is attached for your information.

On 25 July 2017 officers from Devon, Somerset and Torbay Trading Standards carried out a mystery shopping exercise at this premises using a 21 year old female. This female was sold alcohol without staff asking any questions, despite there being several conditions on the Premises Licence in respect of Challenge 21 and the need to request approved forms of identification. As a result of this exercise the premises received a written warning.

On 26 July 2017 Mrs Smart was in Lucius Street when she bumped into Miss Mankowska. She therefore went to Off Licence TQ Ltd with Miss Mankowska where she was shown a refusals book with entries therein. Miss Mankowska also explained that she had ceased the sale of single cans and Mrs Smart noted that there were several signs around the premises to that effect.

At 10.00 am on the morning of 18 October 2017 Mrs Smart attended Off Licence TQ Ltd at the request of Miss Mankowska. At that time Miss Mankowska advised Mrs Smart that she and her partner, Pete, wanted to start reselling single cans due to the impact that this had had on their business. They were both very vocal with Mrs Smart and annoyed that other premises in the area were still selling single cans. Mrs Smart explained that she could not make other premises stop selling single cans but she would seek their voluntary agreement. She was also informed that in respect of other off licence premises Mrs Smart did not have any evidence that they were selling alcohol to the street drinkers.

Miss Mankowska informed Mrs Smart that she had received a letter from Torbay Council advising her that her staff had not checked the ID of a person who Trading Standards took into the premises. This was probably the letter she would have received after the 25 July 2017 "mystery shopping exercise". She also indicated that she had had a visit from HMRC. Miss Mankowska felt that she and her premises were being discriminated against, but Mrs Smart assured her that that was not the case and it was just a coincidence that other agencies had recently visited.

Mrs Smart advised Miss Mankowska and Pete that ultimately they can sell singles cans if they so wish but should evidence come to her attention that they are selling to known street drinkers who then cause issues in the cemetery the police would have to consider taking further action. Mrs Smart suggested that perhaps they should not sell single cans of anything over 6% but they did not seem willing to consider this.

After leaving Off Licence TQ Ltd on 18 October 2017, Mrs Smart went to St Andrews Churchyard and looked in the bins, which contained cans with Polish writing "Zywiec". This product is stocked in Off

Licence TQ Ltd. Mrs Smart could not see any cans with English writing thereon. According to Google, the abv of Zywiec is 5.6%.

On 31 October 2017 Mrs Smart spoke to PCSO Laurence Gaywood concerning the off licence premises in the Belgrave Road and Lucius Street area. PCSO Gaywood indicated that he is of the opinion that stopping the sale of single cans does have a positive effect on reducing alcohol supply to the street drinkers. Mrs Smart and PCSO Gaywood also discussed intelligence around shoplifters taking their stolen goods to Off Licence TQ Ltd and action that may be taken in the future in relation to this.

As a result of lengthy discussions with Miss Mankowska and her partner, and her discussions with PCSO Gaywood, Mrs Smart decided to send letters to all other off licence premises in the area seeking their cooperation by agreeing not to sell single cans. Letters regarding this were subsequently sent out on 9 November 2017.

On 4 January 2018 Mrs Smart attended the premises in the company of PC Mike Haworth and other officers of the Neighbourhood Team, when a search warrant, issued under Section 28 of the Theft Act 1968, was executed at the premises. The DPS, Miss Iwona Mankowska was present throughout. What appeared to be a CS gas canister was located behind the counter and, when shown this by a police officer, Miss Mankowska stated that this item was hers. All alcohol on display in the shop was checked for UK Duty Paid stamps and all appeared to be correctly labelled, however numerous bottles without the stamp were located in a storage area at the rear of the premises. All this alcohol and the CS gas canister were seized. Miss Mankowska stated that the storage area belonged to residents of the upstairs or neighbouring flat, however the key to this area was located within the storeroom of her premises. The police also seized a large quantity of clothing items, which they believed to be stolen. Located behind the counter it was noted that there was a cut down or broken pool/snooker cue with silver tape around the end. Whilst this item could be classed as an offensive weapon, it was located behind the counter which is not deemed a public place in the eyes of the law, and therefore was not seized by police. However, if it were to be taken to the public side of the counter an offence of possession of an offensive weapon in a public place would be committed.

At the conclusion of the search, Miss Mankowska was escorted to Torquay Police Station where she admitted that the CS gas canister was hers, however she denied any knowledge of the alcohol seized.

On inspection of the bottles of alcohol seized, these were as follows:

5 x 700ml bottles of Zoladkowa 40% abv
34 x 500ml bottles of Soplka (flavoured vodka) 30% abv
10 x 500ml bottles of Zubrowka Bison Grass 37.5% abv
1 x 700 ml bottle of Zubrowka Biala 40% abv
1 x 700ml bottle of Krupnick 40% abv

On 11 January 2018 Mrs Smart again attended Off Licence TQ Ltd, this time in the company of PC's Haworth and Owen, together with 5 officers from HMRC. Whilst the HMRC Officers conducted a search of the premises, a male customer came in and selected a packet of kitchen rolls and 1 can of Lomez beer. Miss Mankowska let this male take the products without paying and contrary to the notice displayed on the door that stated that single cans of alcohol would not be sold. Lomez has an abv of 7.5%. Again it was noted by officers that the broken snooker/pool cue with silver tape thereon was located behind the counter.

Whilst officers continued their enquiries in the premises, Mrs Smart attended St Andrews Churchyard where she saw several empty cans of Perla Mocna within the bins.

The HMRC Officers now have possession of the 50 bottles of spirits identified above, and they will consider what action they wish to take in respect of this matter. However I would take this opportunity to advise you that the evasion of duty is a relevant offence under Section 170 (disregarding subsection 1(a)(fraudulent evasion of duty etc) and Section 170B (taking preparatory steps for evasion of duty) under the Customs and Excise Management Act 1979.

In relation to the CS gas canister this has been examined and tested by a firearms officer. As a result Miss Mankowska was charged that on Thursday 4 January 2018 at Torquay in the County of Devon, without the authority of the Secretary of State, had in her possession a weapon designed or adapted for the discharge of a gas, namely O-chlorobenzylidene malonontrite contrary to Section 5(1)(b) of and Schedule 6 to the Firearms Act 1968. She was summoned to the South and West Devon Magistrates Court on 7 March 2018 and when she appeared on that day she was convicted of the offence. She was fined £200, with £85 costs and £30 victim surcharge. Our computer records do not show whether any action was taken in respect of her Personal Licence, or whether she produced her Personal Licence to the magistrates as she is so required by Section 128 of the Licensing Act 2003. A check with the Torbay Council Licensing Team has established that Miss Mankowska has not informed the Licensing Authority of her conviction, as she is required to do under Section 132 of the Licensing Act 2003.

Any offence under the Firearms Act is a relevant offence and the rehabilitation period for this conviction is one year.

Please tick ✓ yes

Have you made an application for review relating to the premises before

No

If yes please state the date of that application

Day Month Year

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If you have made representations before relating to the premises please state what they were and when you made them

Please tick ✓ yes

- I have sent copies of this form and enclosures to the responsible authorities and the premises licence holder or club holding the club premises certificate, as appropriate
- I understand that if I do not comply with the above requirements my application will be rejected

IT IS AN OFFENCE, LIABLE ON CONVICTION TO A FINE UP TO LEVEL 5 ON THE STANDARD SCALE, UNDER SECTION 158 OF THE LICENSING ACT 2003 TO MAKE A FALSE STATEMENT IN OR IN CONNECTION WITH THIS APPLICATION

Part 3 – Signatures (please read guidance note 4)

Signature of applicant or applicant's solicitor or other duly authorised agent (please read guidance note 5). If signing on behalf of the applicant please state in what capacity.

Signature

[Handwritten Signature]

Date

28.03.2018.

Capacity

*Superintendent, Head of Prevention, Devon & Cornwall
Police*

Contact name (where not previously given) and postal address for correspondence associated with this application (please read guidance note 6)

Julie Smart
Police Licensing Officer
Torquay Police Station
South Street

Post town
Torquay

Post Code
TQ2 5AH

Telephone number (if any) 01803 218900

If you would prefer us to correspond with you using an e-mail address your e-mail address (optional) julie.smart@devonandcornwall.pnn.police.uk

Notes for Guidance

1. A responsible authority includes the local police, fire and rescue authority and other statutory bodies which exercise specific functions in the local area.
2. The ground(s) for review must be based on one of the licensing objectives.
3. Please list any additional information or details for example dates of problems which are included in the grounds for review if available.
4. The application form must be signed.
5. An applicant's agent (for example solicitor) may sign the form on their behalf provided that they have actual authority to do so.
6. This is the address which we shall use to correspond with you about this application.

