

[Insert details including name and address of licensing authority and application reference if any (optional)]

**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 Bill Masini (On behalf of Trading Standards)

*(Insert name of applicant)*

**apply for the review of a premises licence under section 51 of the Licensing Act 2003 for the premises described in Part 1 below**

**Part 1 – Premises or club premises details**

<b>Postal address of premises or, if none, ordnance survey map reference or description</b> Adams News 6 Coldharbour Lane	
<b>Post town</b> London	<b>Post code (if known)</b> SE5 9PR
<b>Name of premises licence holder or club holding club premises certificate (if known)</b>	
<b>Number of premises licence or club premises certificate (if known)</b>	

**Part 2 - Applicant details**

I am

**Please tick yes**

1) an interested party (please complete (A) or (B) below)

- |   |                          |
|---|--------------------------|
| a) a person living in the vicinity of the premises                                  | <input type="checkbox"/> |
| b) a body representing persons living in the vicinity of the premises               | <input type="checkbox"/> |
| c) a person involved in business in the vicinity of the premises                    | <input type="checkbox"/> |
| d) a body representing persons involved in business in the vicinity of the premises | <input type="checkbox"/> |

- 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

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 Southwark Council – Trading Standards  Bill Masini Trading Standards Officer Community Safety & Enforcement 3 <sup>rd</sup> Floor Hub 1 PO Box 64529 London SE1P 5LX
Telephone number (if any) 0207 525 2629
E-mail address (optional) bill.masini@southwark.gov.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
- 2) public safety
- 3) the prevention of public nuisance
- 4) the protection of children from harm

<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

**Please state the ground(s) for review (please read guidance note 1)**

**Prevention of Crime and disorder –**

- Various breaches of Premise Licence conditions
- Duty evaded alcohol offered for sale
- Duty evaded alcohol bearing counterfeit trade marks and “Duty stamp”
- Unauthorised licensable activity – failure to use secure window only after midnight (condition 340)
- Employment of an illegal immigrant.

**Public Safety**

- Breach of Premise Licence conditions - fire extinguishers not maintained
- Illegal unsafe novelty lighters

On 8 December 2016 Trading Standards carried out a joint visit with Police Officers from Southwark's "Night Time Economy" Team. The purpose was to check for compliance with the Premise Licence, Trading Standards legislation and other criminality such as employing illegal workers. On this occasion an expert on illicit and counterfeit alcohol also accompanied these officers.

The premise has a licence that permits alcohol to be supplied 24 hours 7 days a week subject to any sales after midnight being sold through a secure window which prevents customers entering the premises (condition 340). See later for further comment on this condition.

This is important to point out the shop is in an area where there is a serious problem with alcohol abuse. It is almost on the junction with Denmark Hill and as such is very close to Kings College Hospital where there are alcohol dependency treatment facilities.

On entering the shop it was clear that alcohol was available for sale. Behind the counter when entering the shop was a man who gave his name as [REDACTED] and an address that was the same as the shop's. Mr [REDACTED] did not hold a personal licence. There was one other person working in the shop who also spoke to the Police. He gave his name as [REDACTED] (DoB: [REDACTED]). He was later arrested by the Police because he was an Indian National who had entered this country illegally.

Condition 336 of the premise licence requires there to be a personal licence holder on the premise at all times that alcohol is supplied and Trading Standards say this condition was breached.

Since 1 January 2007 it has been a requirement of The Duty Stamp Regulations 2006 that retail bottles of alcohol of proof 30% ABV and higher and packaged in sizes of 35cl and larger have to carry a duty stamp to be legal for retail sale. The term "fake UK duty stamp" is used to describe a stamp that appears to comply with the design specification in the regulations but is not produced on behalf of HMRC or the product's manufacturer or distributor. Where in the case of a manufacturer which has its trade mark on this label, the trade mark is also infringed because it has been used without the manufacturer's consent and authorisation. This is an offence under The Trade Marks Act 1994.

The term "duty diverted" is used to describe alcohol produced in the UK for export but illegally placed on the UK market. Spirits produced for export are not subject to duty and must not have labels incorporating duty stamps. Duty diversion takes place when alcohol for export is relabelled with fake labels bearing fake UK duty stamps.

UK market alcohol sold for export is required to have any associated duty stamp obliterated; this is done by exporters using either a non-removable round sticker or by the physical removal (scratching out) of the duty stamp. Having done this it is normal for the outer box to have the words "**UK DUTY STAMP**" obliterated, or simply not applied to the box in order to differentiate it from the regular UK market stock.

On close examination a significant quantity of what is commonly referred to as "duty diverted spirits" were on offer for sale.

On the shelf behind the counter were:

- 5 x 35cl bottles of Glen's vodka (37.5% ABV). The rear labels on all the bottles had been replaced with a fake label bearing a fake UK duty stamp.

On another shelf were:

- 6 x 1 litre bottles of Glen's vodka (37.5% ABV). The rear labels on both bottles had been replaced with a fake label bearing a fake UK duty stamp.

On another shelf were:

- 3 x 70cl bottles of High Commissioner blended Scotch whisky (40% ABV). The rear labels on all the bottles had been replaced with a fake label bearing a fake UK duty stamp.

In a rear stockroom of the shop was:

- 1 x 24 x 35cl outer box of Glen's vodka containing 6 x 35cl bottles of Glen's vodka. The box had the words "**UK DUTY STAMP**" printed on the side to indicate it was manufactured for the UK market. These words had been inked out with a black pen. (see photo 1). This is an indication that an outer box of UK market stock was sold for export. The box also had evidence of having been opened and resealed with clear tape. Normally the 24 x 35cl outer box contains 4 lots of six shrink wrapped 35cl bottles. The six bottles were not shrink wrapped. On examination, it was evident the rear labels on bottles inside had been replaced with fake labels bearing fake UK duty stamp
- 1 x 12 x 70cl outer box containing 9 x 70cl bottles of High Commissioner blended Scotch whisky. The box had the words "**UK DUTY STAMP**" printed

on the side to indicate it was manufactured for the UK market. Once again these words had been inked out with a black pen. (see photo 2). This is an indication that an outer box of UK market stock was sold for export. The box also had evidence of having been opened and resealed with clear tape. On examination, it was evident the rear labels on bottles inside had been replaced with fake labels bearing fake UK duty stamp.

In total, seized for duty diverted alcohol (and therefore illegal to be sold because duty had not been paid) were

- 11 x 35cl bottles of Glen's vodka
- 12 x 70cl bottles of High Commissioner whisky
- 6 x 1 litre bottles of Glen's vodka

The rate of alcohol duty on a 35cl 37.5% ABV spirit was £3.70 (£4.44 inc VAT) up to 23 March 2015 and is currently £3.63 (£4.36 inc VAT).

The rate of alcohol duty on a 70cl 40% ABV spirit was £7.90 (£9.48 inc VAT) up to 23 March 2015 and is currently £7.74 (£9.29 inc VAT)

The rate of alcohol duty on a 1 litre 37.5% ABV spirit was £10.58 (£12.70 inc VAT) up to 23 March 2015 and is currently £10.37 (£12.45 inc VAT)

The duty and VAT therefore evaded for these spirits (taking the current lower duty rates) totals:

11 x 4.36 = £47.96 [Glens 35cl bottles]

12 x 9.29 = £111.48 [High Commissioner 70cl bottles]

6 x 12.45 = £74.70 [1 litre Glen's]

**Total = £234.14**

It is not clear how many other similar such items had been previously sold. Bottles that were legitimate were left in the shop

Also offered for sale were so called super strength beers. These drinks are almost exclusively consumed by people who have a serious alcohol addiction problem and contain a high number of units of alcohol per can. These people often have mental health issues and may live a chaotic lifestyle. This in turn can result in them becoming so called "street drinkers". In doing so this addiction can lead to public nuisance and the commission of anti-social behaviour type offences such as aggressive begging and urinating in public places. In this part of Southwark there are

a significant number of people who are trying, though often struggling, to overcome their alcohol addiction, even with medical treatment. The easy availability of such drinks can therefore be a huge temptation for such people, particularly where the price is low.

H.M. Government seeks to use price as part of its strategy to reduce consumption of these super strength beers. The duty payable including VAT on these beers varies depending on the percentage alcohol by volume. A beer called Oranjeboom black with an ABV of 8.5% was on sale (see photo 3). The duty payable on a 500ml can was £1.22 in the year 2016-2017. In this premise it was priced at £1.50 meaning if it was to be legal, there was a difference of 28 pence to account for all the manufacturers' costs, their transportation costs and profit, the wholesalers' mark up and the retailer's mark up. Strong beers with an ABV of 8% sold in 500ml cans had a duty payable of £1.15. Again, this premise had quantities of such beers (Tennent's Super, Skol Super, Carlsberg Special Brew and Kestrel Super) priced for sale at £1.50 as seen in photograph 3; again a difference of just 35 pence to account for all the manufacturers' costs, their transportation costs and profit, the wholesalers' mark up and the retailer's mark up. It is completely unrealistic and unbelievable that such a legally sourced and duty paid beer can be sold by an independent retailer for anything less than at least £2.20. Retailing such a product at 28 pence more than the duties payable also undermines completely any Government Public Health strategy and of course gives the retailer an unfair commercial advantage over its legitimate competitors.

This illegal practice has been identified as a widespread and real problem in Southwark which officers are seeking to address.

In the stockroom there were large quantities of these drinks and these clearly formed a significant part of the business. By way of example, there were eight trays of Special Brew, five trays of Skol Super and 6 trays of Oranjeboom "black". Each tray contains 24 cans. (see photo 4).

Suspicious these drinks were also subject to some form of evaded duty or other illegality, Trading Standards required the premise licence holder to produce his purchase invoices for the super strength beers as well as for the seized spirits. It is an offence to fail to produce traceable invoices (alcohol falls within the definition of food) under The General Food Hygiene Regulations 2013.

Also seized at the time of the visit were seven novelty lighters that were illegal under The Consumer Protection Act, in that they were unsafe.

Other breaches of the licence conditions were found, namely

- Condition 225 – Fire extinguishers - failure to examine at least annually and periodically test. One fire extinguisher had a label on it stating the next discharge was to be in 2011. (see photo 5)
- Condition 311 – no notice displayed warning customers to leave quietly

On 12 December 2016 [REDACTED] was interviewed under caution and in accordance with the requirements of The Police and Criminal Evidence Act. In that interview he said he always got the drinks from a named cash and carry in south east London and produced seven invoices, two of which were dated *after* the visit. The remaining five invoices went back to 28 May 2016. None of these showed purchases for the strong beers or 1 litre bottles of Glen's. One invoice from a reputable and respected wholesaler dated nearly 7 months earlier (28 May) showed a purchase of 1 box of 24 x 35cl bottles of Glen's and a purchase of 1 box of 6 70cl bottles of High Commissioner whisky. It should be pointed out there were compliant bottles found at the time of the visit and these were left in the shop. Also, as explained earlier, the boxes found in the shop had had the words "UK DUTY STAMP" crossed through and had been resealed. Trading Standards would not accept any argument that the offending bottles had come from this Cash & Carry.

Asked specifically about the Oranjeboom, [REDACTED] said:

"Oranjeboom, I couldn't find the invoice But I think I can find it somewhere. It all comes from [name of a Cash & Carry] anyway".

The officer later said,

"Just to summarise, with respect to the super strength beers, you're saying you got them from [name of a Cash & Carry]?"

[REDACTED]: "Yes".

Later in the interview the officer asked,

"Can I just clarify with the Oranjeboom, you say you got it from [name of a Cash & Carry], as well?"

[REDACTED]: "As well".

In relation to the novelty lighters, [REDACTED] said someone came into the shop offering them for sale and he bought some but did not get any paperwork so he did not know who he bought them from. Trading Standards say regardless of circumstances and the product's legality and Mr [REDACTED] "just cannot resist a bargain"



As stated earlier, condition 340 states, "That those sales after midnight are conducted through a secure window which prevents customers entering the premises". The licence is not worded at all well to say what time the shop can then open its front door again and make sales in the usual manner whereby customers come into the shop. On Friday 16/Saturday 17 December 2016 another visit was made to the premise for the purpose of checking whether this condition was complied with and also what price the business was selling so called super strength beers for. The premise was observed from immediately across the road from 23.50 hours. No attempt was made to close the front door at midnight and only make sales through the secure window which is adjacent to the front door. Customers entered and left the shop on a very regular basis. At 00:26 hours the officer entered the shop and picked up a can of Special Brew (8% ABV) from the fridge which was immediately opposite the till. Of note was the fact that all the drinks apart from the super strength beers were priced. The super strength beers included Skol Super, Tennent's Super, Kestrel Super as well as the Special Brew. Also of note was that the strong K-cider (8.4% ABV) was priced. The officer went to the counter and the sole member of staff behind the counter sold the drink saying the price (without any hesitation or doubt) was £1.50. The officer then introduced himself, explained the situation and asked if he held a personal licence. The man said he did not and called a man from a room at the back of the shop. The man who came from the back of the shop said he was [REDACTED] and he was the owner, premise licence holder and DPS. He was unable to offer an explanation for the sale other than to say the shop was closed which was clearly not true. He said he had never used the secure window and the layout of the shop indicated to the officer that this statement was true. When challenged as to the price of the Special Brew he said it should be £2.29 and that the price stickers must have come off. Trading Standards do not accept that explanation and say the lack of pricing is deliberate; stating a sale price of £1.50 would be obvious to an enforcement officer that the product has been sourced illegally. Further, those who buy the products on a very regular basis know the price the retailer charges without looking at a price ticket. (See photo 6). There was a clock on the wall clear for all to see the time. It was displaying the correct time and a photo was taken immediately after the sale. (see photo 7). Throughout the conversation the officer had with [REDACTED] customers continued to come into the shop seeking to buy alcohol; he took no steps to close the front door as soon as he was told about this matter but merely (incorrectly) said the shop closed at midnight.

On 20 February 2017 [REDACTED] was re-interviewed under caution. He had failed to produce the invoices he had been asked for. He continued to say the super strength

beers came from the previously named Cash and Carry, that they delivered it to the shop and he paid them cash but did not get invoices. He said he had challenged the Cash and Carry about this and he now got invoices from. This was his reason for not being able to produce invoices. Knowing the Cash & Carry Trading Standards do not accept this explanation.

The officer asked again about the Oranjeboom.

**Officer:** So are you saying the Oranjeboom 8.5% comes from [name of Cash & Carry]?

█: No

**Officer:** It doesn't? Do [cash & carry] sell Oranjeboom 8.5?

█: No, I tell you, Oranjeboom, the day you came one of my friend, he closed his shop. He gave it to me, he said, "I've closed the shop in Streatham and you can take the stock from me". I said, "No". He left it there and as soon as you came, so I took everything to him...

**Officer:** Your story is changing .....

█: Oranjeboom we just got rid of already. We don't have any. We didn't even sell it...

Please see photo 3 where it was on sale on 8 December.

Mr █ was unable to say where the shop in Streatham was or even who his apparent friend's name was apart from "█". The interview continued:

█: He just gave it to me. He just brought the van and said "I have some stock"

**Officer:** What was the name of the business then?

█: I don't know exactly, but his name is █

**Officer:** Whereabouts was that business?

█: In Streatham High Street somewhere, I don't know where.

**Officer:** Have you ever visited him?

█: No, he would normally come and see me in Cash and Carry, that's it

Officer: How much stock did he give you?

█: Just only may be ten or eleven cases

Officer: Ten or eleven cases?

█: Yes

Officer: How much does that come out to?

█: No I didn't pay him a penny. He just gave it to me. He said "Sell it and give me" and then I thought

Later in interview:-

Officer: If I look on the photos on my camera, will I see Oranjeboom in the fridge?

█: No

Later in interview:-

Officer: Why did he want to take it back when he wanted to give it to you?

█: I told him "I don't sell it, so take it back".

Officer: Why didn't you want to sell that particular beer as opposed to any other beer? Why did you want to give it back to him?

█: Because we don't sell that product, we've never sold Oranjeboom in any shops.

Officer: But you had an opportunity to try it didn't you at no cost, no risk to you?

█: No it was risk because I've never tried it. We don't have much space in the shop anyway. You can see my space, it's very limited. We try to fit in everything.

**Officer: But you had the opportunity. A friend of yours gave you ten trays at no cost and you had the opportunity to put it in, just to test it.**

Trading Standards say both of [REDACTED] explanations are complete fabrications. Oranjeboom black is manufactured in Holland and therefore if duty is not paid on it and it enters the country, it is in effect smuggled alcohol. Section 144 of the Licensing Act creates an offence of keeping smuggled goods on a licensed premise. Trading Standards say Mr [REDACTED] aware of the dubious circumstances around how he acquired the Oranjeboom black, quickly removed it after he was asked about it under caution on 12 December and required to produce invoices. It was not on display in the shop on 16/17 December when a test purchase was made.

Mr [REDACTED] later accepted a simple caution of knowingly having smuggled alcohol on his premise, failing to produce traceable invoices for the alcohol he was required to produce and for breaching condition 340 by allowing sales to take place inside the premise and not using the secure window.

Trading Standards feel it is relevant to point out to the sub-committee that the events at this premise are not the first time problems with Mr [REDACTED] business activities have come to its or other Borough's attention. Mr [REDACTED] is the premise licence holder and DPS for a business some 300 metres away at [REDACTED]

Some 13 months previous to this matter, Mr [REDACTED] accepted simple cautions for

1. On 6 November 2015 - Knowingly kept or allowed to be kept Wray and Nephew over proof rum and Rum Bar Rum (a Wray and Nephew product) which had been imported without payment of duty or which had otherwise been unlawfully imported – contrary to s144(1) Licensing Act
2. On 2 occasions - 29 October 2015 and again 6 November 2015 carried on a licensable activity otherwise than under and in accordance with an authorisation, namely condition 336 – no personal licence holder on premise when alcohol was sold
3. On 29 October 2015 - carried on a licensable activity otherwise than under and in accordance with an authorisation, namely condition 334 – no age identification scheme established and maintained.
4. On 2 September 2015 - carried on a licensable activity otherwise than under and in accordance with an authorisation, namely condition 340 – staff not

trained in a proof of age identification scheme and able to identify approved forms of identification. Records of such training were required to be kept at the premise.

5. On 29 October 2015 – sold alcohol to a female under 18 years of age – contrary to s146(1) Licensing Act
6. On 29 October 2015 – sold cigarettes to a female under 18 years of age – contrary to The Children and Young Persons (Protection from Tobacco) Act 1991.

Enquiries were made of Lambeth Council and information received from them indicated that from 2005 to 02.06.2014 Mr [REDACTED] was the Designated Premises Supervisor for a premise called [REDACTED]

[REDACTED] (in Lambeth Borough). The Premise Licence Holder was and is [REDACTED]

During that time a number of issues arose whilst Mr [REDACTED] was the Designated Premises Supervisor: -

1. 28.05.08 – underage sale of cigarettes to a child – Trading Standards test purchase exercise
2. 20.02.09 – underage sale of alcohol to a child – Trading Standards test purchase exercise
3. 02.03.10 – counterfeit Bollinger Champagne was seized by Trading Standards
4. 19.04.11 – underage sale of alcohol to a child – Trading Standards test purchase exercise. [REDACTED] (wrongly said to Trading Standards he was the DPS) and attended the premise. At the time no summary of licence was not displayed and no copy of licence was available for inspection at the premises).
5. 03.03.12 – alcohol sold after terminal hour of midnight.
6. 06.04.13 – alcohol sold after terminal hour of midnight – seller was 16 year boy – [REDACTED] s.son.
7. 16.04.13 – 2 illegal workers in shop and duty evaded spirits were seized
8. 29.04.14 – Trading Standards test purchase of alcohol made after the terminal hour. Upon entering shop to explain this, sales of alcohol were continuing.

Lambeth Trading Standards then submitted an application to review that Premise Licence.

Trading Standards say the matters before the sub-committee are of a serious nature

and little, if any, notice appears to have been taken when [REDACTED] committed similar offences at his other business in Gamberwell Church Street and also whilst DPS at the Price Cutter shop in Lambeth. Mr [REDACTED] has sought to mislead officers throughout which has resulted in a time consuming investigation. Trading Standards say Mr [REDACTED] therefore has unnecessarily created aggravating factors here.

The sub-committee is therefore invited to revoke the premise licence for all the reasons given in this application.

However, if not revoked, in addition to any suspension, the sub-committee may wish to consider the addition of a number of conditions. If so, Trading Standards would like to see the removal of conditions 125, 288, 289, 340, 8AA, 8AB, 8AC and 8AI and following conditions added to the licence:

- No beers, lagers or ciders in single cans, bottles or multi-packs with an ABV of more than 5% will be displayed, sold or offered for sale from the premises
- Alcohol shall not be sold in an open container or be consumed in the licensed premises and no container of an alcoholic drink shall be opened by anyone on the premise.
- The premises shall operate an agecheck 'Challenge 25' policy requiring that staff selling alcohol request that any customer who looks under 25 years old, and who is attempting to purchase alcohol, provides valid photographic identification proving that the customer is at least 18 years old. Valid photographic identification is composed of a driving licence, passport, UK armed services ID card and any Proof of Age Standards Scheme (PASS) accredited card such as the Proof of Age London (PAL) card.
- All staff involved in the sale of alcohol shall be trained in the prevention of sales of alcohol to underage persons, and the challenge 25 scheme in operation at the premises. A record of such training shall be kept / be accessible at the premises at all times and be made immediately available for inspection at the premises to council or police officers on request. The training record shall include the trainee's name (in block capitals), the trainer's name (in block capitals), the signature of the trainee, the signature of the trainer, the date(s) of training and a declaration that the training has been received.
- Clearly legible signs shall be prominently displayed where they can easily be seen and read by customers stating to the effect that a challenge 25 policy is in operation at the premises, that customers may be asked to provide proof of age and stating what the acceptable forms of proof of age are. Such signage shall be displayed at all entrances, points of sale and in all areas where alcohol is displayed for sale. The

signage shall be kept free from obstructions at all times.

- A register of refused sales of alcohol shall be maintained in order to demonstrate effective operation of the challenge 25 policy. The register shall be clearly and legibly marked on the front cover as a register of refused sales, with the address of the premises and with the name and address of the licence holder. The register shall be kept / be accessible at the premises at all times. On a monthly basis, the Designated Premises Supervisor (DPS) shall check the register to ensure it is being properly completed. The DPS shall sign and date the register to that effect and where appropriate take corrective action in a timely manner if the register is not being completed correctly. The register shall be made immediately available for inspection at the premises to council or police officers on request.
- An approved CCTV system shall be installed at the premises that records clear images of both the interior and exterior of the premises. It shall be designed, installed and maintained in compliance with The Information Commissioner's Office (ICO) Code of Practice relating to Closed Circuit Television (CCTV). The CCTV installed inside the premise shall be positioned to capture the sale of alcohol and tobacco products. The CCTV system shall have a minimum of 31 days recording facility and will be maintained in full working order at all times and be continually recording at all times the premise is in use under the licence. The CCTV System must be capable of capturing a clear facial image of every person who enters the premise. All CCTV footage shall be kept for a period of thirty one (31) days and shall, upon request, be made immediately available to The Police and/or Authorised Officers from Southwark Council.
- All staff working at the premise shall be trained and be fully conversant in the correct operation of the CCTV and be able to demonstrate its operation on immediate request by Police and/or Authorised Officers from Southwark Council

It is understood that whilst the premise has a 24/7 licence the current owner does not operate on a 24 hour basis, though of course is currently able to do so if he so wishes. In the event the licence is not revoked, Trading Standards would like the permitted licensable hours to be in accordance with Southwark's current Licensing Policy thereby making redundant the need for secure window service. It would also seek for the shop opening hours to be the same because Trading Standards do not have confidence the business would be able to operate correctly with different hours.

**Please tick yes**

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

If yes please state the date of that application

Day Month Year

**If you have made representations before relating to this 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 3).

Signature of applicant or applicant's solicitor or other duly authorised agent (See guidance note 4). If signing on behalf of the applicant please state in what capacity.

Signature

[Redacted Signature]

Date

19 April 2017

Capacity Trading Standards Officer acting on behalf of Southwark Council

<b>Contact name (where not previously given) and postal address for correspondence associated with this application (please read guidance note 5)</b>	
<b>Post town</b>	<b>Post Code</b>
<b>Telephone number (if any)</b>	
<b>If you would prefer us to correspond with you using an e-mail address your e-mail address (optional)</b>	

**Notes for Guidance**

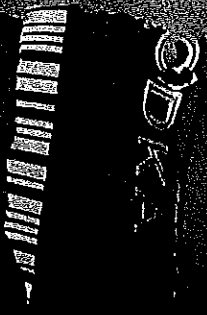
1. The ground(s) for review must be based on one of the licensing objectives.
2. Please list any additional information or details for example dates of problems which are included in the grounds for review if available.
3. The application form must be signed.
4. An applicant's agent (for example solicitor)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

GROSS WT.    
16.6KG

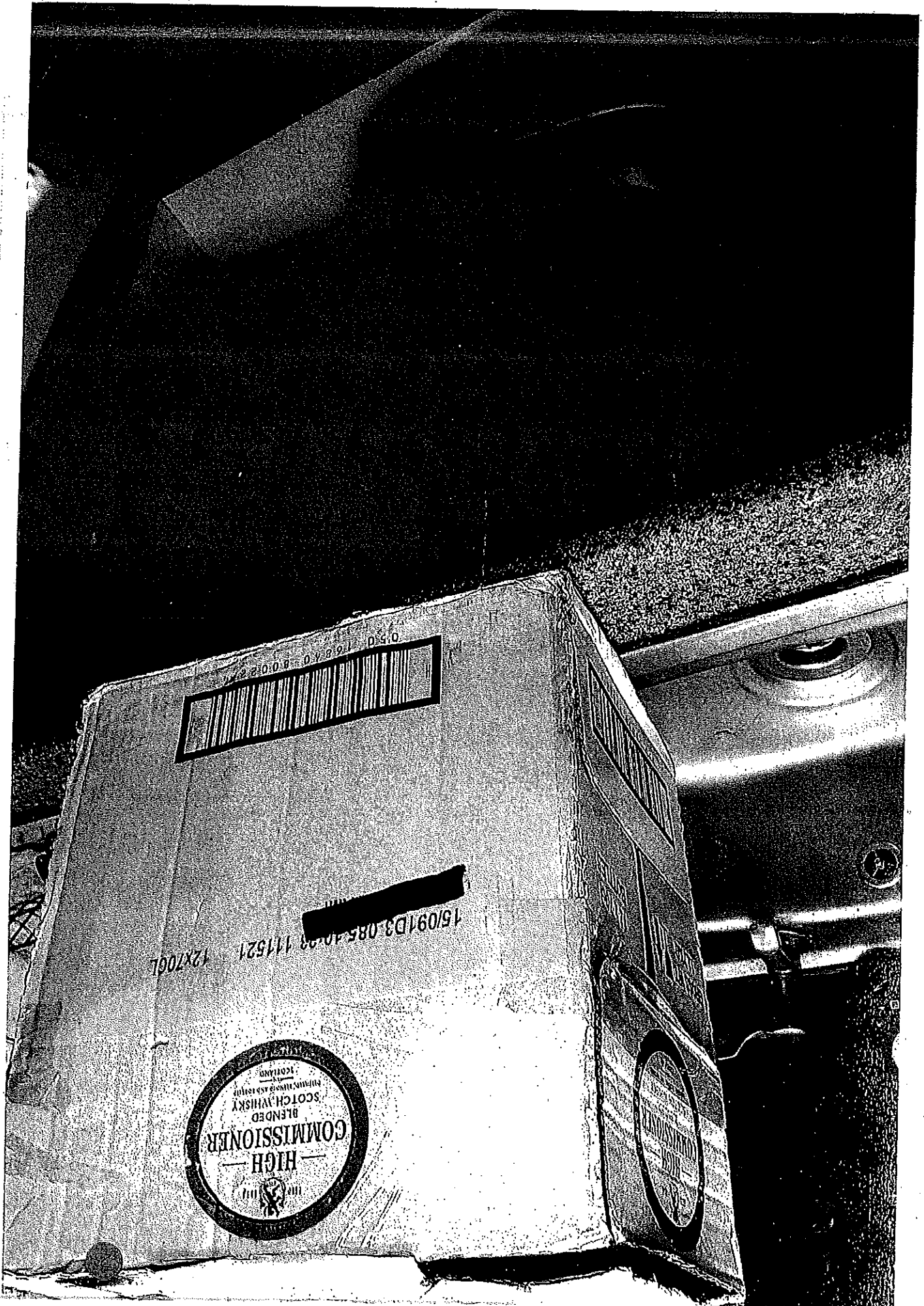
GILBEY'S



SPECIAL VODKA  
GILBEY'S  
VODKA  
PRODUCED AND BOTTLED IN  
SCOTLAND



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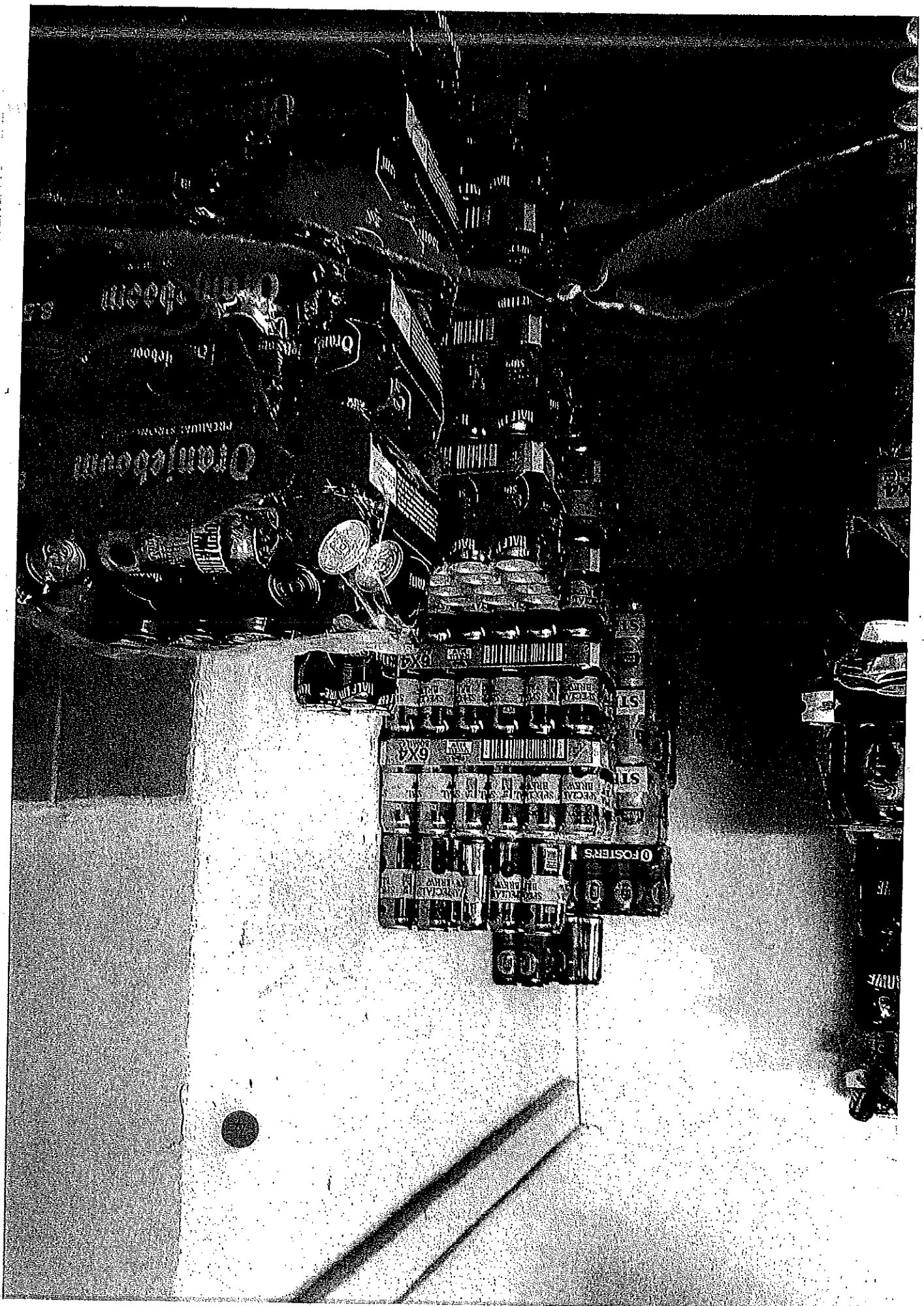
GUINNESS

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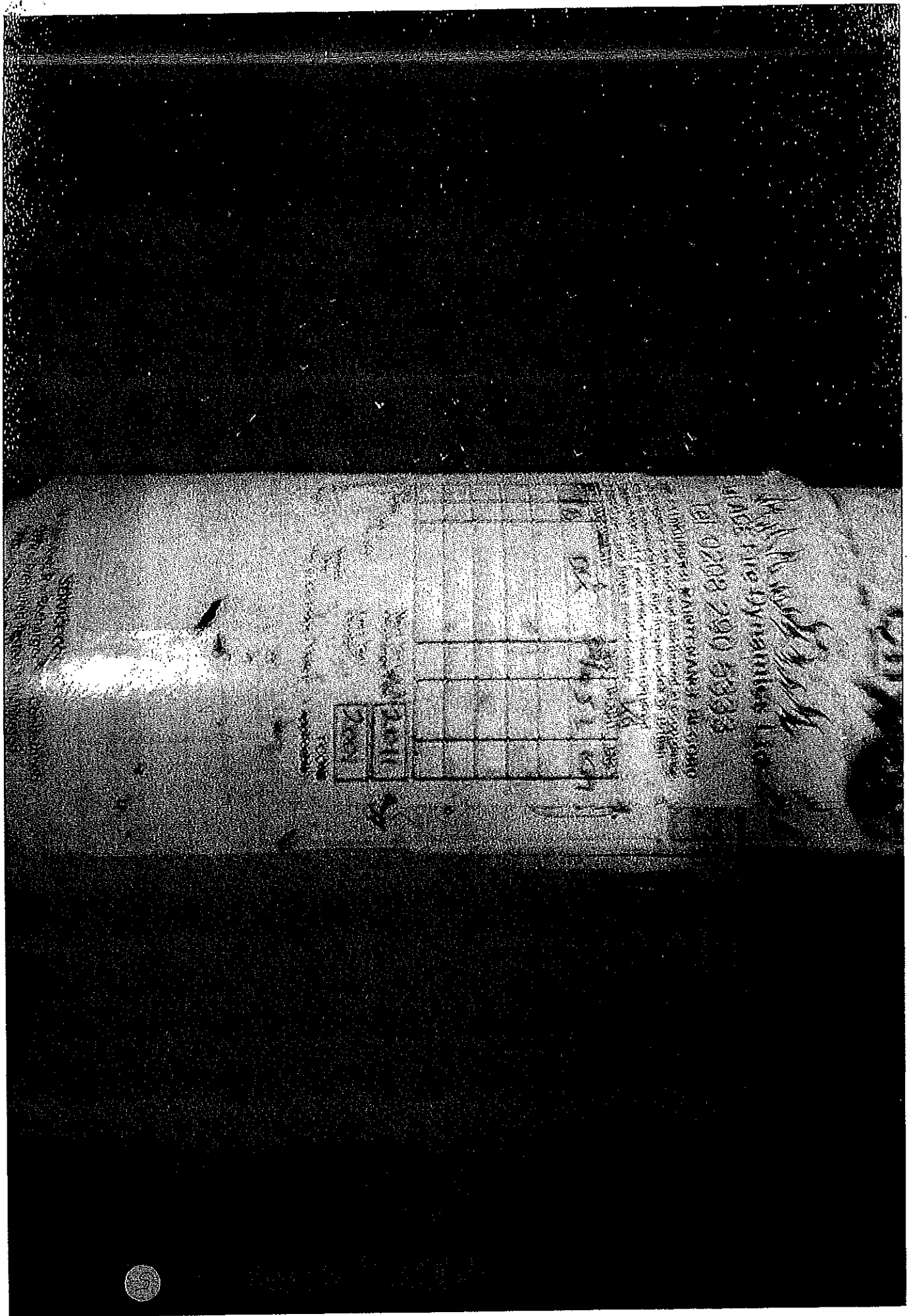
RED BEER

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STELLA ARTOIS







1.39

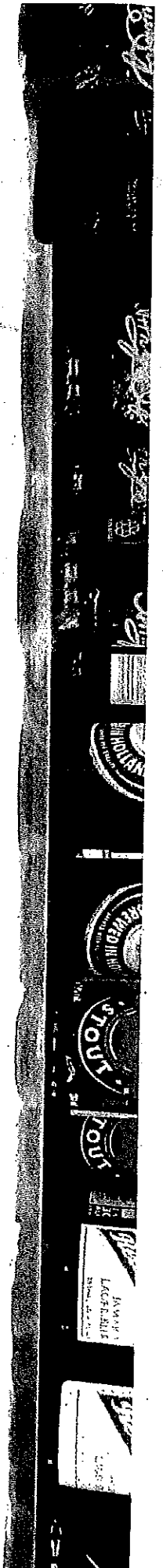
1.39

1.69

1.19

1.49

1.39



1.30

# UNDER 25?

Please be prepared to show proof of age when buying alcohol



[DRINKAWARE.CO.UK](http://DRINKAWARE.CO.UK)

