

**REPORT OF THE GROUP DIRECTOR, NEIGHBOURHOODS AND HOUSING**

<b>LICENSING SUB-COMMITTEE:</b> 13/10/2016	<b>Classification</b>  DECISION	Enclosure
<b>Application for Review of Premises Licence:</b>  Gunners Off Licence 33 Blackstock Road N4 2JF	<b>Ward(s) affected</b>  Brownswood	

**1. SUMMARY**

<b>Applicant</b> Trading Standards	<b>In SPA:</b> No
<b>Date of Application</b> 21 July 2016	
<b>The Grounds for Review:</b>  Alleged use of licensed premises for the sale or storage of smuggled tobacco and alcohol.	
<b>Current Premises Licence Details:</b> Premises Licence permitting: 1) Sale by retail of alcohol  See Appendix B for detail.	
Current Capacity	Unknown
Policies Applicable	LP3 (Operating Schedule), LP4 (Crime and Disorder), LP5 (Public Nuisance), LP6 (Protection of Children from Harm), LP8 (Public Safety)
List of Appendices	Appendix A– Application requesting the review of the premises licence Appendix B – Current Licence Appendix C – Representations from responsible authorities Appendix D - Location map
Relevant Representations	<ul style="list-style-type: none"> <li>Health Authority</li> </ul>

**2. APPLICATION FOR REVIEW OF PREMISES LICENCE**

- 2.1 Trading Standards, as a Responsible Authority under the Licensing Act 2003, have applied for the review of the premises licences granted for the premises known as **Gunners Off Licence, 33 Blackstock Road, N4** on

the grounds of prevention of crime and disorder.

### 3. CURRENT POSITION/ HISTORY

3.1 The premises licence was granted at the Licensing Sub-Committee hearing on 25 October 2010. The current licence permits the following activity:

- 1) Sale by retail of alcohol

A copy of the current licence is attached as Appendix.

### 4. REPRESENTATIONS: RESPONSIBLE AUTHORITIES

From	Relevant Representations details
Environmental Health Authority (Environmental Protection)	No representation received
Environmental Health Authority (Environmental Enforcement)	Have confirmed no representation received on this application.
Environmental Health Authority (Health & Safety)	No representation received
Weights and Measures (Trading Standards)	Not Applicable
Planning Authority	No representation received
Area Child Protection Officer	No representation received
Fire Authority	No representation received
Police	No representation received
Licensing Authority	Have confirmed no representation received on this application.
Health Authority	Representation received on the basis of prevention of crime and disorder.

### 5. REPRESENTATIONS: INTERESTED PARTIES

From	Details
Representation received from and on behalf of local residents.	No representation received

### 6. REPRESENTATIONS: LICENSEE

6.1 None

### 7. POLICY CONSIDERATIONS

7.1 The Licensing Sub-Committee is required to have regard to the Hackney Statement of Licensing Policy (“the Policy”) adopted by the Licensing Authority.

7.2 Extracts from Licensing Policies are reproduced at the front of the agenda for this meeting.

7.3 The Policy applies to applications where relevant representations have been made. With regard to this application, policies LP3 (Operating Schedule), LP4 (Crime and Disorder), LP5 (Public Nuisance), LP6 (Protection of Children from Harm) and LP8 (Public Safety) are relevant.

## **8. GUIDANCE CONSIDERATIONS**

8.1 The Licensing Authority is required to have regard to any guidance issued by the Secretary of State under the Licensing Act 2003.

## **9. OFFICER OBSERVATIONS**

9.1 Trading Standards are seeking to suspend the licence for 6 weeks and to include following conditions in their licence.

1. The licensee will immediately report to Trading Standards any instance of a caller to the shop attempting to sell illegal alcohol or tobacco.
2. The licensee must attend an accredited training course on underage sales and meeting the licensing objectives – organized by Hackney Trading Standards. Failure to attend the training may lead to further sanctions e.g. revocation of licence.
3. The licensee must display in a prominent position a Council poster/window sticker saying “We do not buy or sell illegal tobacco here”.

## **10. REASONS FOR OFFICER OBSERVATIONS**

10.1 Not Applicable

## **11. LEGAL IMPLICATIONS**

11.1 A legal representative will be in attendance to advise Members.

## **12. LEGAL COMMENTS**

12.1 The Council has a duty as a Licensing Authority under the Licensing Act 2003 to carry out its functions with a view to promoting the following 4 licensing objectives;

- The Prevention of crime and disorder
- Public Safety
- Prevention of public nuisance
- The protection of children from harm

12.2 It should be noted that each of the licensing objectives have equal importance and are the only grounds upon which a relevant representation can be made and for which an application can be refused or terms and conditions attached to a licence.

### **13. HUMAN RIGHTS ACT 1998 IMPLICATIONS**

13.1 There are implications on Article 6, Article 8, Article 14 and the First Protocol of Article 1.

### **14. MEMBERS DECISION MAKING**

14.1 Members must, having regard to the application and any relevant representations, take such steps (if any) as it considers necessary for the promotion of the licensing objectives.

#### **14.2 The steps are:**

- A. Option 1  
Take no action**
- B. Option 2  
Modify the conditions of the premises licence.**
- C. Option 3  
Exclude a licensable activity from the scope of the premises licence.**
- D. Option 4  
Remove the designated premises supervisor.**
- E. Option 5  
Suspend the premises licence for a period not exceeding three months.**
- F. Option 6  
Revoke the licence.**

### **15. CONCLUSION**

15.1 That Members decide on the application for review of the premises licence.

<b>GROUP DIRECTOR, NEIGHBOURHOODS AND HOUSING</b>	Kim Wright
<b>Lead Officer (holder of original copy):</b>	Suba Sriramana Licensing Officer Licensing Service 2 Hillman Street E8 1FB Telephone: 020 8356 4915

## LIST OF BACKGROUND PAPERS RELATING TO THIS REPORT

The following document(s) has been relied upon in the preparation of the report.

Description of document	Location
<b>Office File:</b> Gunners Off Licence 33 Blackstock Road N4 2JF	Licensing Service 2 Hillman Street London E8 1FB

### Printed matter

Licensing Act 2003

LBH Statement of Licensing Policy

Hackney  
LA40

**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 **Audrey Dembinski**

*(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**

Gunners Off Licence  
33 Blackstock Road

**Post town** London

**Post code (if known)** N4 2JF

**Name of premises licence holder or club holding club premises certificate (if known)**

Mr Servet Yildiz

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

LBH-PRE-T-1144

**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 Audrey Dembinski Hackney Trading Standards The Annex 2 Hillman Street London E8 1FB
Telephone number (if any) <b>020 8356 4937</b>
E-mail address (optional) audrey.dembinski@hackney.gov.uk

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

- 1) the prevention of crime and disorder
- 2) public safety
- 3) the prevention of public nuisance
- 4) the protection of children from harm

Please tick one or more boxes ✓

- 
- 
- 
-



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

Licensing Objective - The prevention of Crime and Disorder.  
Reviewed guidance issued in March 2015 under section 182 of the Licensing Act 2003 lists certain criminal activity which may arise in connection with licensed premises which the Secretary of State considers should be treated particularly seriously. This list includes the use of licensed premises for the sale or storage of smuggled tobacco and alcohol (Part 11.27)

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

Mr Servet Yildiz, is the Licensee and Designated Premises Supervisor of Gunners Off Licence of 33 Blackstock Road, N.4 and has held this position for approximately six years.

There have been several incidents throughout the years where both illicit tobacco and alcohol have been seized :

On 17<sup>th</sup> March 2016, 280 Foreign Marlborough Gold cigarettes (240 of which were hidden behind a RIZLA box in the tobacco cabinet and 40 of which were found underneath the shelving unit. Also, a total of 139 packets of snuff were also seized. Oral snuff is currently subject to a bn on sale in most European countries including the UK. These were all removed by HMRC.

Mr Servet Yildiz, the Designated Premises Supervisor attended a tape recorded interview conducted under the requirements of the Police and Criminal Evidence Act 1984 (PACE). In the PACE interview, Mr Yildiz claimed that the tobacco was bought for his father.

29<sup>th</sup> September 2014 - HMRC seized illicit spirits, wines and cigarettes.

27<sup>th</sup> February 2012 - Large quantities of tobacco and alcohol which were non duty paid and had incorrect labelling were seized by Trading Standards, where a simple caution was administered.

28<sup>th</sup> September 2010 HMRC seized 134 litres of spirits, 52 litres of wine, 660 cigarettes and 1.5kg of hand rolling tobacco - all non duty paid.

#### Recommendations:

I would recommend a suspension of the licence for 6 weeks. This will act as a future deterrent and also give the Disignated Premises Supervisor time to review procedures, train staff and update stock and also to add the following conditions added to the licence:

- 1) The licensee will immediatley report to Trading Standards any instance of a caller to the shop attempting to sell illegal alcohol OR TOBACCO;
- 2) The licensee must attend an accredited training course on underage sales and meeting the licensing objectives - organised by Hackney Trading Standards. Failure to attend the training may lead to further sanctions eg revocation of licence;
- 3) The licensee must display in a prominent position a Council poster/window sticker saying "We do not buy or sell illegal tobacco here."

11.27 of the guidance states that there is certain criminal activity that may arise in connection with licensed premises, which the Secretary of State considers should be treated particulary seriously. This includes 'the use of licensed premises for the sale of smuggled tobacco and alcohol.' 11.28 of this guidance states that 'it is envisaged that licensing authorities would use the review procedures effectively to deter such activities and crime. Where reviews arise and the licensing authority determines that the crime prevention objective is being undermined through the premises being used to further crimes, it is expected that revocation of the licence - even in the first instance - should be seriously considered.

tick ✓ yes

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

Please

If yes please state the date of that application

Day Month Year

--	--	--	--	--	--	--	--	--	--	--	--

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

tick ✓ yes

Please

- 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 Andrzej Dombariski

Date 21st July 2016

Capacity Principal Commercial Standards Officer

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

Andrzej Dombariski  
Hackney Trading Standards,  
The Annex,  
2 Hillman Street,

Post town London Post Code E8 1DY

Telephone number (if any) 020 8356 4937

If you would prefer us to correspond with you using an e-mail address your e-mail address (optional) andrzej.dombariski@hackney.gov.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.



**This premises licence has been issued by:**

Licensing Service  
2 Hillman Street  
London E8 1FB

**PART A – PREMISES LICENCE**

**Premises Licence Number**

LBH-PRE-T-1144

**Part 1 – Premises details**

Gunners Off Licence  
33 Blackstock Road  
Hackney  
London  
N4 2JF  
020 7704 9936

**Where the licence is time limited the dates**

Not Applicable

**Licensable activities authorised by the licence**

Supply of Alcohol

**The times the licence authorises the carrying out of Licensable activities**

**Supply of Alcohol      Standard Hours:**

**Premises:**              Mon 08:00-00:00  
                                 Tue 08:00-00:00  
                                 Wed 08:00-00:00  
                                 Thu 08:00-00:00  
                                 Fri 08:00-01:00  
                                 Sat 08:00-01:00  
                                 Sun 08:00-00:00

**The opening hours of the premises**

**Premises                      Standard Hours:**

Mon 07:00-00:00  
Tue 07:00-00:00  
Wed 07:00-00:00

Thu 07:00-00:00  
Fri 07:00-02:00  
Sat 07:00-02:00  
Sun 07:00-02:00

**Where the licence authorises supplies of alcohol whether these are on and/or off supplies**

Off Premises

**Part 2 –**

**Name, (registered) address, telephone number and e-mail (where relevant) of holder of premises licence**

Mr Servet Yildiz  
49 Napier Road  
London  
EN3 4QS

**Registered number of holder, for example company number, charity number (where applicable)**

Not Applicable

**Name, address and telephone number of designated premises supervisor where the premises authorises the supply of alcohol**

Mr Servet Yildiz

**Personal licence number and issuing authority of personal licence held by designated premises supervisor where the premises licence authorises the supply of alcohol**

**Date of Grant:** 4 November 2010

**Signed:**

**David Tuitt**  
**Team Leader - Licensing**

## Annex 1 - Mandatory Conditions

### Supply of Alcohol

1. No supply of alcohol may be made under the premises licence:
  - (a) At a time when there is no designated premises supervisor in respect of the premises licence.
  - (b) At a time when the designated premises supervisor does not hold a personal licence or his personal licence is suspended.
2. Every supply of alcohol under the premises licence must be made or authorised by a person who holds a personal licence.
3.
  - 3.1. The premises licence holder or club premises certificate holder must ensure that an age verification policy is adopted in respect of the premises in relation to the sales or supply of alcohol.
  - 3.2 The designated premises supervisor in relation to the premises licences must ensure that the supply of alcohol at the premises is carried on in accordance with the age verification policy.
  - 3.3. The policy must require individuals who appear to the responsible person to be under 18 years of age (or such older age as may be specified in the policy) to produce on request, before being served alcohol, identification bearing their photograph, date of birth and either:-
    - (a) a holographic mark or
    - (b) an ultraviolet feature.

### Minimum Drinks Pricing

4.
  - 4.1 A relevant person shall ensure that no alcohol is sold or supplied for consumption on or off the premises for a price which is less than the permitted price.
  - 4.2 For the purposes of the condition set out in paragraph 4.1 above
    - (a) "duty" is to be construed in accordance with the Alcoholic Liquor Duties Act 1979;
    - (b) "permitted price" is the price found by applying the formula -
$$P = D + (D \times V)$$
Where -
      - (i) P is the permitted price,
      - (ii) D is the rate of duty chargeable in relation to the alcohol as if the duty were charged on the date of the sale or supply of the alcohol, and
      - (iii) V is the rate of value added tax chargeable in relation to the alcohol as if the value added tax were charged on the date of the sale or supply of the alcohol;
    - (c) "relevant person" means, in relation to premises in respect of which there is in force a premises licence -
      - (i) the holder of the premises licence,
      - (ii) the designated premises supervisor (if any) in respect of such a licence, or
      - (iii) the personal licence holder who makes or authorises a supply of



alcohol under such a licence;

(d) "relevant person" means, in relation to premises in respect of which there is in force a club premises certificate, any member or officer of the club present on the premises in a capacity which enables the member or officer to prevent the supply in question; and

(e) "value added tax" means value added tax charged in accordance with the Value Added Tax Act 1994.

4.3 Where the permitted price given by Paragraph 4.2(b) above would (apart from this paragraph) not be a whole number of pennies, the price given by that sub-paragraph shall be taken to be the price actually given by that sub-paragraph rounded up to the nearest penny.

4.4 (1) Sub-paragraph 4.4(2) below applies where the permitted price given by Paragraph 4.2(b) above on a day ("the first day") would be different from the permitted price on the next day ("the second day") as a result of a change to the rate of duty or value added tax.

(2) The permitted price which would apply on the first day applies to sales or supplies of alcohol which take place before the expiry of the period of 14 days beginning on the second day.

## **Annex 2 – Conditions consistent with the Operating Schedule**

5. The licence holder shall maintain a comprehensive colour CCTV system at the premises that ensures all areas of the licensed premises are monitored, including all entry and exit points and the street environment, and which enables frontal identification of every person entering in any light condition. All cameras shall continually record whilst the premises are open to the public and video recordings shall be kept available for a minimum of 31 days with time and date stamping. Tape recordings shall be made available to an authorised officer from the Council or police officer together with facilities for viewing. The recordings for the preceding two days shall be made available immediately on request. Recordings outside this period shall be made available on 24 hours notice (subject to the requirements of the Data Protection Act 1998)
6. A staff member who is conversant with the operation of the CCTV system shall be on the premises at all times when it is open to the public. This staff member shall be able to show the Police or the Licensing Authority recent data or footage with the absolute minimum of delay when requested.
7. The Designated Premises Supervisor shall ensure that all management staff are trained to use and maintain the Incident Book. The Incident Book shall be readily available for inspection by the Police or other regulatory agencies, both internal and / or external to the Council.
8. The licence holder shall maintain an Incident Book at the premises to record the following:-  
all crimes reported to the venue

all ejections of patrons  
any complaints received  
any incidents of disorder  
seizures of drugs or offensive weapons and their location.  
any faults in the CCTV system  
any visit by a relevant authority or emergency service  
Details of all the above shall be contemporaneously recorded in the Incident Book and the entry countersigned by the Designated Premises Supervisor.

9. Premises will provide the police with a dispersal policy and comply with its contents to ensure that all patrons leave the venue and the vicinity quickly and quietly. Notices to be displayed at exits requesting that patrons respect the needs of local residents and leave the premises and the area quietly.
10. Signs to be displayed stating that alcohol will not be sold to underage drinkers and that ID will be sought in line with Challenge 21.
11. A refusals book to be used to record details of instances where staff have refused a customer thought to be under age.

### **Annex 3 – Conditions attached after a hearing by the licensing authority**

12. No alcoholic goods will be purchased or taken from persons calling at the premises.
13. The Licensee will immediately report to Trading Standards any instance of a caller to the shop attempting to sell alcohol.
14. Invoices (or copies) for all alcoholic goods on the premises will be kept at the shop premises and made available to officers from the council, police or HMRC on request;
15. A stock control system will be introduced, so that the licensee can quickly identify where and when alcoholic drinks have been purchased;
16. An ultra violet light will be available at the premises for the purpose of checking the UK Duty stamp on spirits as soon as practical after they have been purchased;
17. If any spirits bought by the business have UK Duty stamps that do not fluoresce under ultra-violet light, or are otherwise suspicious, the licensee shall identify the supplier to Hackney Trading Standards.

### **Annex 4 – Plans**

PLAN/LBH-PRE-T-1144/290710

**RESPONSIBLE AUTHORITY REPRESENTATION:  
APPLICATION UNDER THE LICENSING ACT 2003**

**RESPONSIBLE AUTHORITY DETAILS**

NAME OF AUTHORITY	City and Hackney Public Health directorate
ADDRESS OF AUTHORITY	City and Hackney Public Health 1 Hillman St London E8 1DY
CONTACT NAME	Shivangi Medhi
TELEPHONE NUMBER	020 8356 2253
E-MAIL ADDRESS	<a href="mailto:shivangi.medhi@hackney.gov.uk">shivangi.medhi@hackney.gov.uk</a>

**APPLICATION PREMISES**

NAME & ADDRESS OF PREMISES	<b>Gunners Off License, 33 Blackstock Rd, N4 2JF</b>
NAME OF APPLICANT/PREMISES USER	<b>Mr Servet Yildiz</b>

**COMMENTS**

I make the following relevant representations in relation to the above application.

- |    |                                      |                                     |
|----|--------------------------------------|-------------------------------------|
| 1) | the prevention of crime and disorder | <input checked="" type="checkbox"/> |
| 2) | public safety                        | <input type="checkbox"/>            |
| 3) | the prevention of public nuisance    | <input type="checkbox"/>            |
| 4) | the protection of children from harm | <input type="checkbox"/>            |

Dr Penny Bevan  
Director of Public Health  
Hackney Council

12<sup>th</sup> August 2016

## **RE: Representation to support the review of Gunners off license**

As Director of Public Health (a responsible authority under the Licensing Act 2004) I wish to make a representation in support of the review brought forward by Trading Standards.


The City and Hackney Public Health function recognises the role that licensed premises play in contributing to the local economy, but the dense availability of alcohol has a significant impact on the health and wellbeing of many of the borough's residents. It is therefore vitally important that premises allowed to sell alcohol are well managed and responsible with the sale of alcohol.

Tackling alcohol misuse is key to achieving the aspirations of Hackney's Health and Wellbeing Strategy. We want to establish an environment that recognises the role of alcohol in our society, whilst minimising the significant health damage caused by alcohol misuse. Licensing is an important component in the wider efforts to reduce this harm. Tobacco Control is another key facet of Hackney's Health and Wellbeing strategy, and tackling the availability of illegal tobacco in the borough is key to achieving tobacco control objectives and reducing the health impacts of tobacco.

This representation is made under the **prevention of crime and disorder** licensing objective.

The availability of illicit alcohol and tobacco in premises such as these make it easier for residents to access these products at reduced prices. If residents can access cheap tobacco, it makes it harder for smokers to quit and also makes it easier for non-smokers to start and ex-smokers to relapse. Making cheap tobacco available makes it easier for children to start smoking and enables them to become hooked at a young age. Furthermore, it allows criminal activity to take place in the borough.

The sale of illegal tobacco and alcohol suggest mismanagement at this premise, and the fact that seizures have been made at the premises on several occasions over several years shows continued mismanagement after multiple warnings. The sale of alcohol and tobacco need to be controlled in order to reduce their potential damage to residents, and if venues are failing to make responsible sales, the potential for harm is great.

A decorative graphic at the bottom right of the page consisting of three parallel, curved lines in shades of green, sweeping from the bottom right towards the center.



Based on the information provided above I would like to support Trading Standards in their review of this premise, and to see actions taken to prevent future sale of illegal alcohol and tobacco on the premises.

Yours sincerely

A black rectangular box containing the handwritten signature 'Penny Bevan' in white ink.

Dr Penny Bevan  
Director of Public Health  
London Borough of Hackney and City of London Corporation

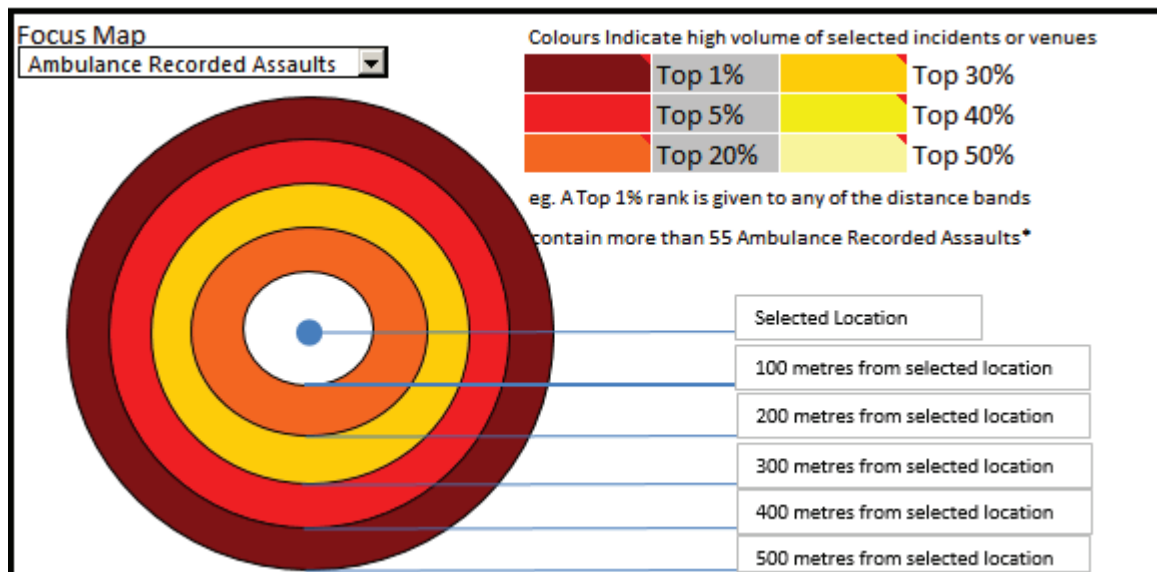


## Appendix A – Bullseye Data on alcohol related incidents

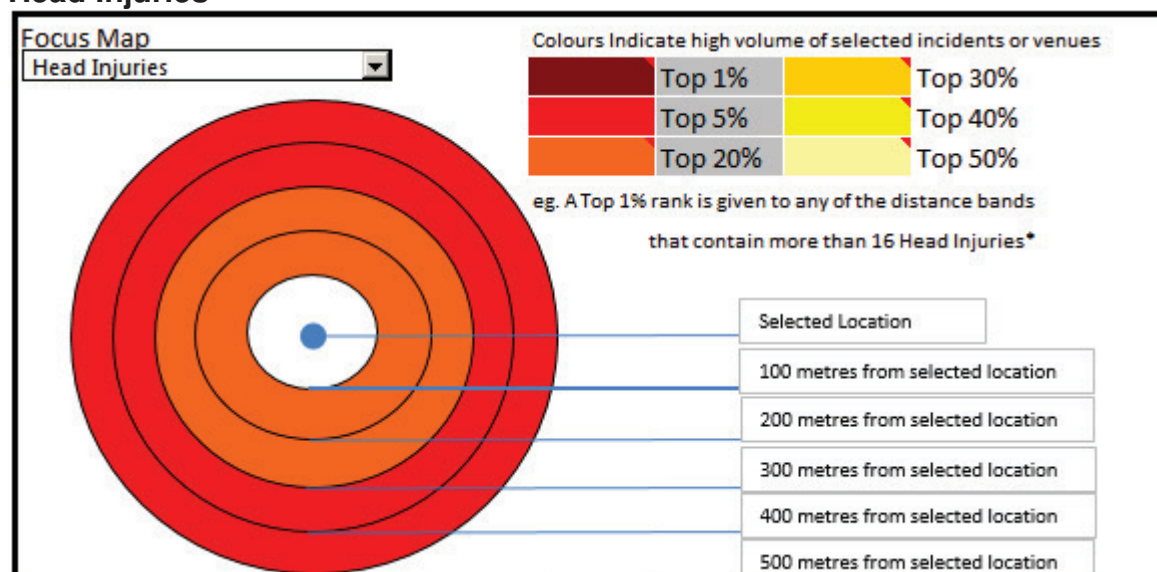
The Bullseye Dashboard was developed by the Safestats team for the purposes of scanning for and revealing crime and disorder trends related potentially to alcohol licensing.

The centre of the bullseye represents incidents that occur within 100 meters of the postcode location. The colour coding reveal whether the location is in the top 1-50% of incident counts for the relevant source data (e.g the number of ambulance recorded assaults in Hackney within a given timeframe).

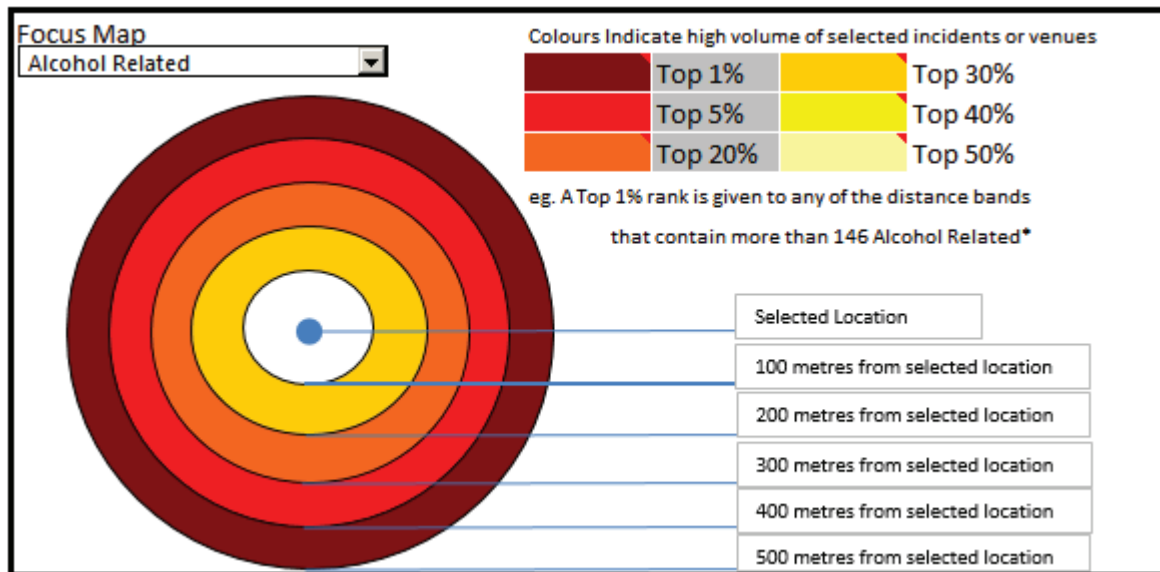
### Ambulance recorded assaults



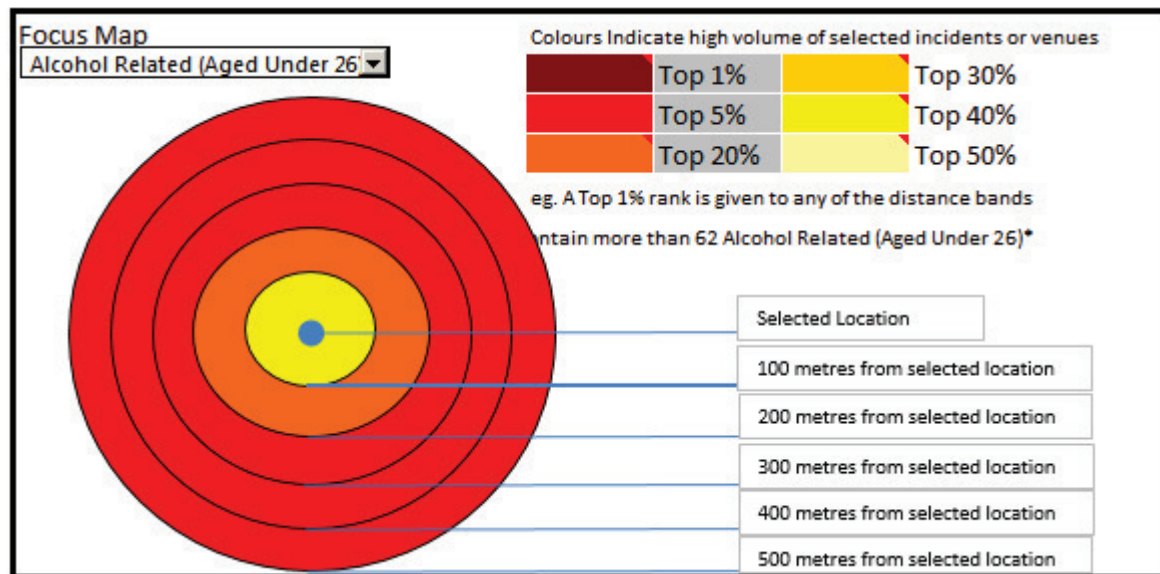
### Head Injuries



## Alcohol related incidents recorded by emergency services



## Alcohol related incidents recorded by emergency services (under 26 year olds)



### Data Quality Caveats

There are important caveats with regard to Safetstats data quality. The bullseye dashboard tool, as seen above, is a scanning tool. It reveals general trends. The data may not be an exact mirror of events.

For the analysis of premises within 500m of the application venue, a small amount of data cleaning was undertaken (sourcing postcodes for 15 venues with missing/incomplete postcodes; corrected postcode formatting). Data accuracy may be affected by inputting accuracy.

# Appendix D



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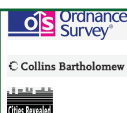
33 Blackstock Road

Scale 1/1250

at A4



Date 4/10/2016



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