

## Bob Brown

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**From:** Ian Wheeler  
**Sent:** 04 September 2015 09:57  
**To:** Bob Brown  
**Cc:** Ian Wheeler  
**Subject:** RE: Consultation on Licensing Policy (Licensing Act 2003)

Hi Bob,

Thank you for attached amended policies which you sent as part of the Licensing consultation process.

I would have no adverse comment to make on behalf of the Environmental Health Team.

Kind Regards

Ian.

Ian Wheeler  
Environmental Health Manager  
Hastings Borough Council  
Aquila House  
Breeds Place  
Hastings  
East Sussex. TN34 3UY  
01424 783230

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**From:** Bob Brown  
**Sent:** 28 August 2015 13:46  
**To:** 'Jean.Irving@sussex.pnn.police.uk'; 'Paul.Phelps@sussex.pnn.police.uk'; 'hastings.firesafety@esfrs.org'; Christine Barkshire-Jones; Ian Wheeler; Mike Fagan; 'Dick Edwards'; 'Rob Woods'; 'douglas.sinclair@eastsussex.gov.uk'; 'trading.standards@eastsussex.gov.uk'; 'publichealth@eastsussex.gov.uk'; 'info@hastingschamber.co.uk'; Members; Pranesh Datta; 'chrismattconnelly@gmail.com'; Ray Crawford  
**Subject:** Consultation on Licensing Policy (Licensing Act 2003)

<< File: Questionnaire suggesting possible areas for feedback2015.doc >> << File: Licensing policy amended 2015.doc >> << File: Licensing Policy letter 2015.doc >> << File: Matrix for licensing policy.docx >> CONSULTATION ON HASTINGS LICENSING ACT 2003 POLICY.

Please find attached a copy of our amended policy (with tracked changes to show amendments) and associated papers for the Licensing Act 2003.

We are seeking your views in respect of the policy and the saturation zones contained within the policy, we have also attached a short questionnaire to assist you but do not feel constrained by it. We are only proposing to consult until the 30<sup>th</sup> September 2015 and would appreciate any comments you may have as soon as possible.

Further details will be available from our website [www.hastings.gov.uk](http://www.hastings.gov.uk) under the consultation link. Any responses should be forwarded to Bob Brown, Licensing Manager, Aquila House, Breeds Place Hastings, TN34 3UY. Or sent via e mail [bbrown@hastings.gov.uk](mailto:bbrown@hastings.gov.uk)

## Bob Brown

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**From:** Christine Barkshire-Jones  
**Sent:** 07 September 2015 16:48  
**To:** Bob Brown  
**Subject:** RE: Consultation on the amended Statement of Principles . Gambling Act 2005.

Bob all seems fine to me.

Chris

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**From:** Bob Brown  
**Sent:** 28 August 2015 13:46  
**To:** Members; Mike Fagan; Christine Barkshire-Jones; Ray Crawford; 'Rob Woods'; 'Paul.Phelps@sussex.pnn.police.uk'; 'Dick Edwards'; 'info@salvationarmy.co.uk'; 'mail@abb.uk.com'; 'info@bacta.org.uk'; 'hastings.firesafety@esfrs.org'; 'harry@coastalamusements.co.uk'; 'stade.hastings@gmail.com'; 'Andrew Isaacs'; 'trading.standards@eastsussex.gov.uk'; 'douglas.sinclair@eastsussex.gov.uk'; 'publichealth@eastsussex.gov.uk'  
**Subject:** Consultation on the amended Statement of Principles . Gambling Act 2005.

### CONSULTATION ON OUR REVISED STATEMENT OF PRINCIPLES UNDER THE GAMBLING ACT 2005

Please find attached a letter and copy of our track changed statement of principles under the Gambling Act. We are seeking any views you may have in relation to this prior to the policy going before members for a full Council decision.

Further information and the policy will also be published on our website [www.hastings.gov.uk](http://www.hastings.gov.uk) under the consultation link.

Bob Brown  
Licensing Manager, Licensing Team  
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## Bob Brown

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**From:** Steve Johnson <Steve.Johnson@eastsussex.gov.uk>  
**Sent:** 21 September 2015 15:57  
**To:** Bob Brown  
**Subject:** RE: Consultation on the amended Statement of Principles . Gambling Act 2005.

Dear Bob,

With reference to the consultation on this revised document, this Service has no particular observations or comment for consideration. The due regard to proof of age schemes and smuggled or pirated goods is welcomed.

Regards

S P Johnson  
Senior Trading Standards Officer

Trading Standards Service  
Communities, Economy & Transport  
East Sussex County Council  
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County Hall,  
St Anne's Crescent,  
Lewes,  
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**From:** Bob Brown [<mailto:BBrown@hastings.gov.uk>]  
**Sent:** 28 August 2015 13:46  
**To:** Members; ~Z Ext Safer Hastings Partnership; Christine Barkshire-Jones; Ray Crawford; 'Rob Woods'; 'Paul.Phelps@sussex.pnn.police.uk'; 'Dick Edwards'; 'info@salvationarmy.co.uk'; 'mail@abb.uk.com'; 'info@bacta.org.uk'; 'hastings.firesafety@esfrs.org'; 'harry@coastalamusements.co.uk'; 'stade.hastings@gmail.com'; 'Andrew Isaacs'; Trading Standards; Douglas Sinclair; Public Health  
**Subject:** Consultation on the amended Statement of Principles . Gambling Act 2005.

### CONSULTATION ON OUR REVISED STATEMENT OF PRINCIPLES UNDER THE GAMBLING ACT 2005

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Bob Brown  
Licensing Manager, Licensing Team  
Hastings Borough Council  
Aquila house  
Breeds Place  
Hastings  
East Sussex.

Bob Brown  
Licensing Manager  
Hastings Borough Council  
Aquila House  
Breeds Place  
Hastings  
East Sussex  
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24<sup>th</sup> September 2015

Dear Bob

**Consultation on Hasting Borough Council's Statement of Principles – Gambling Act 2005**

Coral Racing Limited is most grateful to be given the opportunity to respond to this consultation exercise. Coral was one of the first national bookmakers to be licensed under the Betting and Gaming Act of 1960, and so has been operating the length and breadth of the UK for over 50 years. Its premises comprise locations in the inner city, on the high street, in suburbs and in rural areas, and in areas of both high and low deprivation. It now operates 1850 betting offices across Great Britain, which comprise about 20% of all licensed betting offices. It is, therefore, a highly experienced operator.

Coral Racing Limited are broadly supportive of the document. It again notes that the Board when considering applications are still required to 'aim to permit gambling' where this is 'reasonably consistent with the licensing objectives', additionally noting that it should not take into account of any moral objections to gambling.

Coral Racing Limited recognise the requirement to supply risk assessments with future applications & variations following the consultation completion (requirement is from 6<sup>th</sup> April 2016) and are pleased to see this detail included within the Draft Statement at section 6.4.2. The requirements and information you include is proportionate and sensible whilst being compliant with the new regulations. Coral's experience is that through all it does, it achieves an exemplary degree of compliance already, and attracts negligible evidence of regulatory harm. Through the additional local risk assessment to be introduced, Coral believe that these should be a) to assess specific risks to the licensing objectives in the local area, and b) to assess whether control measures going beyond standard control measures are needed. Your narrative summarises this well.

We do have one area of concern relating to section 3.5.8 which states:-

*When determining an application to grant or review a premises licence, regard will be given to the proximity of other establishments catering to children or vulnerable adults, or to places that are frequented by unaccompanied children and/or vulnerable adults or where children, young people or vulnerable persons are likely to congregate. These may include schools, vulnerable adult centres, addiction centres, day centres or services used by vulnerable adults or residential areas where there may be a high concentration of families with children. It may also include school routes and places that attract unaccompanied children for recreation and leisure.*

Whilst section 3.5.9 indicates that all applications are judged on their merits, it should not be inferred that



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a  company



1700+ shops



mobile



coral.co.uk



0800 242 232

there is any link between the proximity of such premises listed above and causing harm to the licensing objectives.

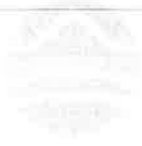
Coral knows of no evidence that children coming from schools are gaining access to betting offices. Coral's general experience, in common with other bookmakers, is that children are not interested in betting, and in any case the Think 21 policy operated by Coral is adequate to ensure that under-age gambling does not occur in their premises. There are very many examples of betting offices sited immediately next to schools and colleges and no evidence whatsoever that they cause problems. Additionally, throughout the country, there are many betting offices in residential areas (on shopping parades etc. alongside other high street operators) which operate responsibly upholding the licensing objectives.

If we can provide any further information, we would be pleased to do so.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'John Liddle', written over a horizontal line.

John Liddle  
Director of Development – Coral Retail



Hastings Borough Council  
Licensing Department  
Environmental Services  
Aquila House  
Breeds Place  
Hastings  
TN34 3UY

Please ask for: Richard Taylor  
Direct Tel: 01482 590216  
Email: [rjt@gosschalks.co.uk](mailto:rjt@gosschalks.co.uk)  
Our ref: RJT / LHK / 097505.00004  
#CS386675  
Your ref:  
Date: 25 September 2015

Dear Sir/Madam,

**Re: Gambling Act 2005 Policy Statement Consultation**

We act for the Association of British Bookmakers (ABB) and have received instructions to respond on behalf of our client to the current consultation on the Council's review of its gambling policy statement.

The ABB represents over 80% of the high street betting market. Its members include large national operators such as William Hill, Ladbrokes, Coral and Paddy Power, as well as almost 100 smaller independent bookmakers.

This response will explain the ABB approach to partnership working with local authorities, it will detail its views on the implementation of the new LCCP requirements, from April 2016, relating to operators' local area risk assessments and their impact on the licensing regime and will then make specific comment with regard to any statement(s) of concern/that are welcomed in your draft policy.

The ABB is concerned to ensure that any changes are not implemented in such a way as to fundamentally change the premises licence regime through undermining the "aim to permit" principle contained within s153 Gambling Act 2005.

The current regime already adequately offers key protections for communities and already provides a clear process (including putting the public on notice) for representations/objections to premises licence applications. The recent planning law changes effective since April 2015 have also already increased the ability of local authorities to consider applications for new premises, as all new betting shops must now apply for planning permission.

It is important that any consideration of the draft policy and its implementation at a local level is put into context. There has recently been press coverage suggesting that there has been a proliferation of betting offices and a rise in problem gambling rates. This is factually incorrect.

Over recent years betting shop numbers have been relatively stable at around 9,000 nationally, but more recently a trend of overall downwards decline can be seen. The latest Gambling Commission industry statistics show that numbers as at 31 Mar 2015 were 8,958 - a decline of 179 from the previous year, when there were 9,137 recorded as at 31 March 2014.

As far as problem gambling is concerned, successive prevalence surveys and health surveys reveal that problem gambling rates in the UK are stable (0.6%) and possibly falling.

### **Working in partnership with local authorities**

The ABB is fully committed to ensuring constructive working relationships exist between betting operators and licensing authorities, and that where problems may arise that they can be dealt with in partnership. The exchange of clear information between councils and betting operators is a key part of this and we welcome the opportunity to respond to this consultation.

There are a number of examples of the ABB working closely and successfully in partnership with local authorities.

### **LGA – ABB Betting Partnership Framework**

In January 2015 the ABB signed a partnership agreement with the Local Government Association (LGA). This was developed over a period of months by a specially formed Betting Commission consisting of councillors and betting shop firms and established a framework designed to encourage more joint working between councils and the industry.

Launching the document Cllr Tony Page, LGA Licensing spokesman, said it demonstrated the *“...desire on both sides to increase joint-working in order to try and use existing powers to tackle local concerns, whatever they might be.”*

The framework built on earlier examples of joint working between councils and the industry, for example the Ealing Southall Betwatch scheme and Medway Responsible Gambling Partnership.

In Ealing, the Southall Betwatch was set up to address concerns about crime and disorder linked to betting shops in the borough. As a result, crime within gambling premises reduced by 50 per cent alongside falls in public order and criminal damage offences.

In December last year, the Medway Responsible Gambling Partnership was launched by Medway Council and the ABB. The first of its kind in Britain, the voluntary agreement allows anyone who is concerned they are developing a problem with their gambling to exclude themselves from all betting shops in the area.

The initiative also saw the industry working together with representatives of Kent Police and with the Medway Community Safety Partnership to develop a Reporting of Crime Protocol that is helpful in informing both the industry, police and other interested parties about levels of crime and the best way to deal with any crime in a way that is proportionate and effective.

Lessons learnt from the initial self-exclusion trial in Medway have been incorporated into a second trial in Glasgow city centre, launched in July this year with the support of Glasgow City Council, which it is hoped will form the basis of a national scheme to be rolled out in time for the LCCP deadline for such a scheme by April 2016.

Jane Chitty, Medway Council's Portfolio Holder for Planning, Economic Growth & Regulation, said: *"The Council has implemented measures that work at a local level but I am pleased to note that the joint work we are doing here in Medway is going to help the development of a national scheme."*

Describing the project, Glasgow's City Treasurer and Chairman of a cross-party Sounding Board on gambling, Cllr Paul Rooney said:

*"This project breaks new ground in terms of the industry sharing information, both between operators and, crucially, with their regulator."*

### **Primary Authority Partnerships in place between the ABB and local authorities**

All major operators, and the ABB on behalf of independent members, have also established Primary Authority Partnerships with local authorities.

These Partnerships help provide a consistent approach to regulation by local authorities, within the areas covered by the Partnership; such as age-verification or health and safety. We believe this level of consistency is beneficial both for local authorities and for operators.

For instance, Primary Authority Partnerships between Milton Keynes Council and Reading Council and their respective partners, Ladbrokes and Paddy Power, led to the first Primary Authority inspection plans for gambling coming into effect in January 2015.

By creating largely uniform plans, and requiring enforcing officers to inform the relevant Primary Authority before conducting a proactive test-purchase, and provide feedback afterwards, the plans have been able to bring consistency to proactive test-purchasing whilst allowing the Primary Authorities to help the businesses prevent underage gambling on their premises.

### **Local area risk assessments**

With effect from 6<sup>th</sup> April 2016, under new Gambling Commission LCCP provisions, operators are required to complete local area risk assessments identifying any risks posed to the licensing objectives and how these would be mitigated.

Licensees must take into account relevant matters identified in the licensing authority's statement of licensing policy and local area profile in their risk assessment, and these must be reviewed where there are significant local changes or changes to the premises, or when applying for a variation to or a new premises licence.

The ABB is concerned that overly onerous requirements on operators to review their local risk assessments with unnecessary frequency could be damaging. As set out in the LCCP a review



should only be required in response to significant local or premises change. In the ABB's view this should be where evidence can be provided to demonstrate that the change could impact the premises' ability to uphold the three licensing objectives.

Although ABB members will be implementing risk assessment at a local premises level, we do not believe that it is for the licensing authority to prescribe the form of that risk assessment. We believe that to do so would be against better regulation principles. Instead operators should be allowed to gear their risk assessments to their own operational processes informed by Statements of Principles and the local area profile.

The ABB supports the requirement as set out in the LCCP, as this will help sustain a transparent and open dialogue between operators and councils. The ABB is also committed to working pro-actively with local authorities to help drive the development of best practice in this area.

### **Local Area Profiles – Need for an evidence based approach**

It is important that any risks identified in the local area profile are supported by substantive evidence. Where risks are unsubstantiated there is a danger that the regulatory burden will be disproportionate. This may be the case where local authorities include perceived rather than evidenced risks in their local area profiles.

This would distort the "aim to permit" principle set out in the Gambling Act 2005 by moving the burden of proof onto operators. Under the Act, it is incumbent on licensing authorities to provide evidence as to any risks to the licensing objectives, and not on the operator to provide evidence as to how they may mitigate any potential risk.

A reversal of this would represent a significant increase in the resource required for operators to be compliant whilst failing to offer a clear route by which improvements in protections against gambling related harm can be made.

We would also request that where a local area profile is produced by the licensing authority that this be made clearly available within the body of the licensing policy statement, where it will be easily accessible by the operator and also available for consultation whenever the policy statement is reviewed.

### **Concerns around increases in the regulatory burden on operators**

Any increase in the regulatory burden would severely impact on our members at a time when overall shop numbers are in decline, and operators are continuing to respond to and absorb significant recent regulatory change. This includes the increase to 25% of MGD, changes to staking over £50 on gaming machines, and planning use class changes which require all new betting shops in England to apply for planning permission.

Moving away from an evidence based approach would lead to substantial variation between licensing authorities and increase regulatory compliance costs for our members. This is of particular concern for smaller operators, who do not have the same resources to be able to put

into monitoring differences across all licensing authorities and whose businesses are less able to absorb increases in costs, putting them at risk of closure.

Such variation would in our opinion also weaken the overall standard of regulation at a local level by preventing the easy development of standard or best practice across different local authorities.

### **Employing additional licence conditions**

The ABB believes that additional conditions should only be imposed in exceptional circumstances where there are clear reasons for doing so - in light of the fact that there are already mandatory and default conditions attached to any premises licence. The ABB is concerned that the imposition of additional licensing conditions could become commonplace if there are no clear requirements in the revised licensing policy statements as to the need for evidence.

This would further increase variation across licensing authorities and create uncertainty amongst operators as to licensing requirements, over complicating the licensing process both for operators and local authorities.

### **Specific Policy Comments**

On a number of occasions within the draft statement of principles, there is an indication that applications are to demonstrate how they are to “promote” the licensing objectives. Whilst applicants are required to promote the licensing objectives under Licensing Act 2003, there is no such requirement under Gambling Act 2005. The policy needs to be amended to reflect the fact that the licensing authority must “have regard” to the licensing objectives. Applicants are required to demonstrate how the operation of Gambling Act premises will be “reasonably consistent” with the licensing objectives and the only body upon whom the Gambling Act 2005 places a duty to promote the licensing objectives is the Gambling Commission.

At paragraph 1.4.2 there is a list of criteria that the licensing authority cannot take into account when determining an application. This list of criteria should be supplemented by recognising that issues of mere nuisance cannot be taken into account.

Paragraph 3.2.4 states that the licensing authority is aware of the distinction between disorder and nuisance but does not define it. The draft statement of principles would be assisted by a statement that nuisance cannot be considered and that the Gambling Commission has stated that “licensing authorities should generally consider disorder as activity that is more serious and disruptive than mere nuisance.”

Policy GLP1 requires that applicants demonstrate within their application measures that will be taken to prevent crime and disorder on the premises. The authority is reminded that there is no facility within the application process (unlike Licensing Act 2003 applications) for these measures to be included. Indeed, to include these additional measures produces an unnecessary additional burden. As from 6<sup>th</sup> April 2016, operators will be required to submit local risk assessments as part of the application process. If GLP1 is satisfied by the submission of the local risk assessment then the policy should make this clear.

The remainder of GLP1 is overly prescriptive. Betting operators have considerable experience with operating licensed premises and have policies and procedures to ensure that the operation of their premises is in accordance with the LCCP, in accordance with the Gambling Commission Guidance and is consistent with the licensing objectives.

One of these measures deals with the location of CCTV cameras. Many operators operate covert as well as overt cameras. Obviously the location of covert cameras is sensitive security information. This should not be shared within a public document.

Overall, we respectfully submit that policy GLP1 is too prescriptive.

Paragraph 3.58 indicates that when determining an application to grant or review a premises licence, regard will be given to the proximity of certain establishments. The proximity of establishments that are frequented by children cannot be an issue upon review unless there is evidence within that review that the operation of the Gambling Act premises is causing specific concerns to those premises. Whilst the proximity of certain premises may be an issue upon application where it will be dealt with the operator's local area risk assessment, it cannot follow that it is necessarily the case upon review.

Paragraph 3.6 and GLP3 deal with access to licensed premises and the protection of children and other vulnerable persons from being harmed or exploited by gambling. Once again, this policy requires applicants to demonstrate within the application certain measures which demonstrate compliance with the licensing objectives and our comments (above regarding GLP1) apply equally here. We respectfully submit that the design and external signage are issues of planning which cannot be taken into account under Gambling Act 2005. The regulation of advertising and promotional material is heavily regulated and is already covered by the Licence Conditions and Codes of Practice. Ordinary Code Provision 5.1.6 requires socially responsible advertising, compliance with CAP and BCAP codes of practice and the Gambling Industry Code for Socially Responsible advertising. The advertising of gambling premises is not therefore an issue for consideration by the Licensing Authority.

Paragraph 4.1 deals with the location of gambling premises and gambling machines. This indicates that the licensing authority will primarily focus on the location, suitability and management of the premises and how this might directly impact upon the licensing objectives. The authority is reminded that s153 requires the licensing authority to aim to permit the use of premises for gambling at all times. The focus must be upon whether or not the application is in accordance with the LCCP, in accordance with the Gambling Commission's Guidance and that the operation would be reasonably consistent with the licensing objectives.

Paragraph 4.2 indicates that regard will be given to the location of the premises and its proximity to other establishments. Once again, this is an issue that will be dealt with in the local area risk assessment.

Paragraph 4.3 causes the ABB significant concerns. Any policy that a specific area is an area where gambling premises should not be located may be unlawful. This paragraph appears to implement a

cumulative impact type policy as exists within the licensing regime under Licensing Act 2003. Such a policy is contrary to the overriding principles of “aim to permit” contained with s153 Gambling Act 2005. Similarly, the reversal of the burden of proof in the final sentence that requires the applicant to demonstrate why an application should be granted is contrary to that principle. These two sentences should be removed and replaced with the reiteration of the principle earlier in the policy that each case will be determined on its own merits.

Paragraph 4.4 indicates that conditions may be attached where there are specific risks or problems associated with a particular locality or specific premises. The policy needs to recognise the fact that conditions can only be imposed where there is evidence in a hearing (following relevant representations) that conditions are necessary in the particular circumstances.

Paragraphs 5.1 and 6.1.6 and GLP5 indicate that conditions may be considered as appropriate and that the authority may exclude default conditions. Once again, the authority is reminded that in order to attach conditions, there must be evidence of a particular risk in a particular circumstance. The policy should make that clear.

Paragraph 6.5 deals with conditions. The ABB welcomes the acknowledgment that the starting point in determining applications will be to grant the application without conditions. However, this statement is not made until paragraph 6.5.1 and is on page 26 of the policy. We respectfully submit that this acknowledgement should be made at the beginning of the policy. In addition, the policy should make it clear that Gambling Act 2005 premises licences are already subject to robust mandatory and default conditions. The policy should acknowledge that in the vast majority of circumstances, these mandatory and default conditions will not need to be supplemented.

The overriding principle of aiming to permit the use of premises for gambling is suppressed by the policy which instead favours regulation. The policy would benefit from a less prescriptive format and an acknowledgement that the vast majority of premises licensed under Gambling Act 2005 operate without causing any risk or concern to any responsible authority or any other person. Whilst the Licensing Authority does have the power to impose conditions, the starting point should be that the mandatory and default conditions will not need to be supplemented and that the licensing authority’s ability to impose conditions is only triggered when there is evidence in a particular circumstance that there is a need for conditions.

## Conclusion

The industry fully supports the development of proportionate and evidenced based regulation, and is committed to minimising the harmful effects of gambling. The ABB is continuing to work closely with the Gambling Commission and the government to further evaluate and build on the measures put in place under the ABB Code for Responsible Gambling, which is mandatory for all our members.

ABB and its members are committed to working closely with both the Gambling Commission and local authorities to continually drive up standards in regulatory compliance in support of the three licensing objectives: to keep crime out of gambling, ensure that gambling is conducted in a fair and open way, and to protect the vulnerable.

Indeed, as set out, we already do this successfully in partnership with local authorities now. This includes through the ABB Code for Responsible Gambling, which is mandatory for all our members, and the Safe Bet Alliance (SBA), which sets voluntary standards across the industry to make shops safer for customers and staff. We would encourage local authorities to engage with us as we continue to develop both these codes of practice which are in direct support of the licensing objectives.

Yours faithfully,



**GOSSCHALKS**