

# GREATER MANCHESTER POLICE - REPRESENTATION

## About You

Name	<b>PC Alan Isherwood</b>
Address including postcode	1 <sup>st</sup> Floor Manchester Town Hall Extension Lloyd Street Manchester
Contact Email Address	alan.isherwood@gmp.police.uk
Contact Telephone Number	0161 856 6017

## About the Premises

Application Reference No.	<b>LPA 265935</b>
Name of the Premises	<b>Biggy's,</b>
Address of the premises including postcode	479, Wilmslow Road, Manchester M20 4AN

## Your Representation

Please outline your representation below and continue overleaf. This should describe the likely effect of the grant of the licence on the licensing objectives on and in the vicinity of the premises in question.

Please accept this as formal notification of the Greater Manchester Police objection to the premises licence in relation to the above premises on the grounds of Prevention of Crime and Disorder and the Prevention of Public Nuisance, Public Safety and the Protection of Children from Harm.

The operating schedule which accompanies the application offers a few very brief, generic conditions. It gives the impression that the applicant has a limited understanding of the Licensing Objectives, which raises concerns about how the premises will be operated.

The likely effect of the grant of the Premises Licence with such a scant operating schedule is that all 4 of the Licensing Objectives will be undermined.

We therefore ask that this application is refused.



**Licensing & Out of Hours Compliance Team - Representation**

Name	Rhiannon Owen
Job Title	Neighbourhood Compliance Officer
Department	Licensing and Out of Hours Compliance Team
Address	Level 1, Town Hall Extension, Manchester, M60 2LA
Email Address	<a href="mailto:Rhiannon.owen@manchester.gov.uk">Rhiannon.owen@manchester.gov.uk</a>
Telephone Number	0161 234 1220

**Premise Details**

Application Ref No	265935
Name of Premises	Biggy's
Address	479 Wilmslow Road, Manchester, M20 4AN

**Representation**

Outline your representation regarding the above application below. This representation should describe the likely effect of the grant of the licence/certificate on the licensing objectives and on the vicinity of the premises.

The Licensing and Out of Hours Team have assessed the likely impact of the granting this application taking into account a number of factors, including the location of the premises at 479 Wilmslow Road, Withington, M20 4AN.

The premises is requesting for late night refreshments to conduct between 11:00hrs and 02:00hrs Sunday- Thursday, 11:00hrs – 04:00hrs Friday-Saturday they are also requesting to shut at these close times.

This premises falls under the Withington Stress area. The premises must show exceptional reasons to be granted a late-night refreshment licence for it to be approved. Upon reading the application unfortunately the applicant does not show this. The operating schedule which included in the application offers very generic conditions. It gives the impression that the applicant has a limited understanding of the Licensing Objectives, along with the CIP area, which raises concerns about how the premises will be operated. For instance they have advised that congregations outside will be managed and loitering customers will be moved; there is no offer of security staff so this suggests employees that are serving food will also be responsible for the managing of the external area, which could be a safety issue.

Because of this we would request the application is refused.

Recommendation:	Refuse Application
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## 265935/PW5: Biggy's, 479 Wilmslow Road, Manchester, M20 4AN

In my capacity as a responsible authority on behalf of the licensing authority, I am objecting to the grant of this application as I believe that it is likely the licensing objectives will be undermined if the licence is granted.

In considering this application, I have had regard to the s182 Guidance and the Council's current Statement of Licensing Policy (published April 2021).

The premises describes itself as a 'fastfood takeaway and delivery service'.

The Council's Statement of Licensing Policy contains a special policy for Withington which creates a strong presumption against granting further such licences. Whilst not a cumulative impact-based policy, it seeks to guard against the development of further problems relating from the operation of late-night takeaways in Withington.

Subsequent to the previous review of the special policy, the Council has published the Withington Village Framework in 2021 (awaiting link for published framework):

The Framework identifies a vision for the Village as a liveable place that meets the needs of its diverse community. It builds on its cultural, physical and heritage assets and seeks to develop these further. New public spaces are proposed along with an improved street environment and movement for pedestrians and cyclists. It was developed through a series of public workshops and stakeholder interviews held in 2019. The City Council received a strong response with a total of 200 responses, which show a high level of support for the framework and the proposals contained within.

The focus of the Framework is to:

- establish a clear Vision to guide and inform development decisions in Withington Village which is supported and driven by the local community;
- provide confidence to partners in the prospects for the Village and to encourage further investment;
- illustrate through a series of precedent images and layouts how design objectives could be achieved;
- identify the focus for public sector and guide private sector investment to transform the Village and to provide a basis for funding bids; and,
- provide a focus for on-going community and public involvement in delivering the Vision for Withington Village.
- The Framework sets out key design and environmental principles in response to the distinctive character and context of the centre, its challenges and opportunities.

Late night antisocial behaviour and litter are identified as threats to realising the successful strategic vision for Withington. Section 10 of the Scrutiny and Executive report (<https://democracy.manchester.gov.uk/documents/s23410/Withington%20Village%20Framework%20Update.pdf>) states:

### *10. Other Comments*

*10.1 There were a wide range of other comments from respondents. The most comments were in relation to perceptions of crime and anti-social behaviour in the Village and the numbers of vulnerable people loitering in the area.*

*10.2 There were also numerous comments made about litter and fly-tipping in the Village. Respondents felt both these issues needed addressing alongside the Framework.*

Page 33 of the Framework itself identifies takeaway premises as one of a number of challenges exist that should be tackled to address on-going issues and enable the centre to build on previous successes:

**Threats:**

An increase in the number of takeaways with the associated environmental and community issues;

Policies on hot food takeaways are an important issue for Withington. As set out on Page 13 of the Withington Village Framework:

Manchester Council adopted a Hot Food Takeaway SPD (Supplementary Planning Document) in March 2017. The document sets out objectives and priorities to encourage centres and neighbourhoods that are vibrant, and contribute positively to the Council's objectives of improving the health of residents. The SPD seeks to maintain the vitality and viability of centres, avoid amenity issues resulting from hot-food takeaways and tackle health concerns around obesity. The SPD seeks to control the over concentration of hot food takeaways and to maintain and promote health.

Although the SPD is a planning document and the promotion of health is not relevant to the licensing objectives, this strategy is evidence of the issues identified in this area associated with the number of hot food takeaways locally. Further, the Withington Village Framework states:

**Land Use (Page 22)**

10% of units in Withington Village are occupied by Hot Food Takeaways (Use Class A5). The Hot Food Takeaway SPD (2017) states that such uses will not be supported in district and local centres where the cumulative impact would be detrimental to the vitality and viability of the centre. Saved UDP Policy WB6 states that conversion of retail and commercial properties to Class A3 (Food and Drink establishments) will not normally be permitted along Wilmslow Road within Withington Village, which restricts the growth of food and drink uses and works to retain the existing retail and commercial properties within Withington Village.

The Council's Policy states at Section 7 (Local Factors) \*emphasis added)

**Consistency with relevant Council strategies**

7.18 The Council recognises that a vibrant evening economy is important, both to the wellbeing of its residents and as a source of economic activity. Accessible district centres and local centres are important in creating a sense of place and focus and, therefore, central to creating neighbourhoods of choice.

7.19 Manchester City Centre and its district centres are places to shop, work, eat, drink, enjoy leisure activities, access services and, increasingly, to live.

7.20 Centres, in particular the city centre and district centres, have an important role as the focus for the city's evening economy. They are a hub for activity and thrive when they attract visitors from the surrounding neighbourhoods.

7.21 An aim for the city is to achieve a better balance of evening and night-time activities and a better distribution throughout the city. In some areas, concentrations of uses associated with the evening economy have led to problems with antisocial behaviour, while other parts of the city suffer from lack of activity during the evening.

***It is important that the uses within centres are carefully balanced so that evening and night-time uses are complementary to neighbouring uses.***

***7.22 Applicants are advised to have regard to any strategic documents produced by the Council for the area, which will provide an excellent reference for identifying and understanding the aspirations and key issues in local areas (see section 2 for more details).***

7.23 If a relevant representation is made, the licensing authority will have the discretion to take

the appropriate steps to promote the licensing objectives.

***7.24 In exercising its discretion and in so far as doing so is appropriate and proportionate to the promotion of the licensing objectives, the licensing authority will aim to take such steps consistent with relevant priorities identified in the representation as set out by any relevant strategic document, such as a:***

- Place Plan
- District Centre Plan
- Local Plan or Ward Plan

The Council has set out a clear vision for Withington Village through the Framework. Granting this application as proposed would directly contradict the aims of the Framework.

Also relevant to the consideration of this matter, the Licensing Policy states:

**Evidence of pre-existing problems in the area**

7.12 Where its discretion is engaged, the authority will give particular consideration to the general character of the surrounding area, including crime and antisocial behaviour (ASB) levels, litter problems, issues regarding underage or proxy sales, and noise complaints. Where there are demonstrable problems linked to the operation of licensed premises in the area and the evidence demonstrates problems with licensed premises in the area, the licensing authority will, in exercising its discretion, take this into consideration when deciding what (if any) steps are appropriate and proportionate in the individual case.

**Proximity of takeaways and off-licences to nightlife entertainment areas**

7.17 Such premises typically lack the type of design and management provisions necessary to process the custom of a large intoxicated late-night customer base, and may act as flashpoints for alcohol-related crime and disorder. Additionally, there is a risk of staff being subjected to threatening behaviour, physical violence, and property damage. Operators are encouraged to consider conflict management training and/or employment of door supervisors, where appropriate. However, where the authority's discretion is engaged, consideration may be given to restricting hours of operation to avoid the risk of such premises acting as flashpoints for crime and disorder.

The steps proposed by the applicant to promote the licensing objectives in their application lack any detail and do not provide any reassurance that the licensing objectives would be promoted should this licence be granted. It is not clear what assessment the applicant has conducted of local risks and consequently sought to address relevant Local Factors and

Standards of the Council's Licensing Policy, as set out in 7.4 and 8.5 of the Policy. Furthermore, they have not addressed the measures set out in the Withington Special Policy.

## Conclusion

The purpose of the Licensing Act 2003 is to prevent problems from happening. The licensing system relies on a prospective consideration of what is warranted in the public interest, having regard to the twin considerations of prevention and deterrence. This principle was confirmed in the case *East Lindsey District Council v Abu Hanif (t/a Zara's Restaurant)* 2016. The Council must carry out its licensing functions with a view to promoting the 4 licensing objectives (s4, LA2003).

Withington Village is a key District Centre in south Manchester which serves the Withington and Old Moat population. It provides a hub for the community and a range of services. It has an active range of community stakeholders who are committed and engaged in the ongoing development of the Village.

The Council has published a clear, strategic vision for the future of Withington and granting this application would be contrary to those aims.

In the case *R (on application of Hope and Glory Public House Ltd) v City of Westminster Magistrates' Court and Others* (2011) EWCA Civ 312, Lord Justice Toulson said:

*"Licensing decisions often involve weighing a variety of competing considerations: the demand for licensed establishments, the economic benefit to the proprietor and to the locality by drawing in visitors and stimulating the demand, the effect on law and order, the impact on the lives of those who live and work in the vicinity, and so on. Sometimes a licensing decision may involve narrower questions, such as whether noise, noxious smells or litter coming from premises amount to a public nuisance."*

Although such questions are in a sense questions of fact, they are not questions of the 'heads or tails' variety. They involve an evaluation of what is to be regarded as reasonably acceptable in the particular location. In any case, deciding what (if any) conditions should be attached to a licence as necessary and proportionate to the promotion of the statutory licensing objectives is essentially a matter of judgment rather than a matter of pure fact."

There are clear and evident concerns with the impact of takeaway premises in this area and has implemented strategies specifically to avoid these issues worsening. The steps proposed to promote the licensing application do not mitigate these concerns.

On balance, it is submitted that granting this application would not be consistent with promoting the licensing objectives in this location and the application should be refused.

**CLLR1**

**From:** Chris Wills <cllr.chris.wills@manchester.gov.uk>

**Sent:** 08 December 2021 14:08

**To:** Premises Licensing <Premises.Licensing@manchester.gov.uk>

**Cc:** Rebecca Moore <cllr.rebecca.moore@manchester.gov.uk>; Becky Chambers <cllr.becky.chambers@manchester.gov.uk>

**Subject:** RE: Premises Licence (new) 265935/PW5: Biggy's, 479 Wilmslow Road, Manchester, M20 4AN, (Withington ward)

Dear Patrick

I am emailing on behalf of the Withington Ward Councillors regarding this application. Withington already has a number of hot food takeaways.

The Council's Statement of Licensing Policy contains a special policy for Withington which creates a strong presumption against granting further licences. Whilst not a cumulative impact-based policy, it seeks to guard against the development of further problems arising due to the operation of late-night takeaways in Withington.

The Withington Stress Area Policy makes a strong presumption against any new hot food takeaways being granted licences. Additionally, the presence of more takeaways in Withington Village does not align with the Vision 2030 set out in the Withington Village Framework (March 2021). In particular:

- On Page 13 of the Framework, it is stated that "Manchester Council adopted a Hot Food Takeaway SPD (Supplementary Planning Document) in March 2017. The document sets out objectives and priorities to encourage centres and neighbourhoods that are vibrant, and contribute positively to the Council's objectives of improving the health of residents. The SPD seeks to maintain the vitality and viability of centres, avoid amenity issues resulting from hot-food takeaways and tackle health concerns around obesity. The SPD seeks to control the over concentration of hot food takeaways and to maintain and promote health." Although the SPD is a planning document, and promotion of health is not covered by the licensing objectives, it is nevertheless reflective of the issues caused by the number of hot food takeaways in Withington Village.
- On Page 22 of the Framework, under "Land Use", it is noted that "10% of units in Withington Village are occupied by Hot Food Takeaways (Use Class A5). The Hot Food Takeaway SPD (2017) states that such uses will not be supported in district and local centres where the cumulative impact would be detrimental to the vitality and viability of the centre."
- In the SWOT analysis on Pages 32-33 of the Framework, one of the potential threats to Withington's future vitality and viability is noted as being "An increase in the number of takeaways with the associated environmental and community issues".

In addition, the Council's Licensing Policy states:

**Evidence of pre-existing problems in the area**

7.12 Where its discretion is engaged, the authority will give particular consideration to the general character of the surrounding area, including crime and antisocial behaviour (ASB) levels, litter problems, issues regarding underage or proxy sales, and noise complaints. Where there are demonstrable problems linked to the operation of licensed premises in the area and the evidence demonstrates problems with licensed premises in the

area, the licensing authority will, in exercising its discretion, take this into consideration when deciding what (if any) steps are appropriate and proportionate in the individual case.

**Proximity of takeaways and off-licences to nightlife entertainment areas**

7.17 Such premises typically lack the type of design and management provisions necessary to process the custom of a large intoxicated late-night customer base, and may act as flashpoints for alcohol-related crime and disorder. Additionally, there is a risk of staff being subjected to threatening behaviour, physical violence, and property damage. Operators are encouraged to consider conflict management training and/or employment of door supervisors, where appropriate. However, where the authority's discretion is engaged, consideration may be given to restricting hours of operation to avoid the risk of such premises acting as flashpoints for crime and disorder.

While the applicant has listed a number of provisions in an attempt to satisfy the licensing objectives, there is a lack of detail and no assurance that these objectives would be promoted if the licence were granted. There is no mention of an assessment undertaken of local risks by the applicant, or an attempt to address relevant Local Factors and Standards of the Council's Licensing Policy (7.4 and 8.5). Nor have they addressed the measures in the Withington Stress Area Policy.

Additionally, when Biggy's first opened they were found to be trading until 4am, which was unlicensed activity. Licensing and Out of Hours were notified of this breach. This therefore calls into question their commitment to abiding by the licensing objectives. This unlicensed trading clearly does not help with the prevention of crime and disorder, prevention of public nuisance, or public safety, the measures proposed notwithstanding.

We would therefore ask that this license be refused.

Best wishes.

Chris

Councillor Chris Wills  
Labour & Co-operative Member, Withington Ward  
Lead Member for LGBT+ Men  
Tel: 07970 395030

**RES1**

**From:** [REDACTED] <[REDACTED]>

**Sent:** 13 November 2021 14:29

**To:** Premises Licensing <Premises.Licensing@manchester.gov.uk>

**Subject:** BIGGYS!!

I do have very serious objections to this application, on many levels.  
First of all this is a rather splendid building, certainly not suitable for a takeaway,  
secondly the juvenile name (to be displayed on said building) and finally, the  
absolutely ridiculous hours it expects to be open (even on Christmas Day!!)  
We are overrun with takeaways in Withington and all the detritus they cause, it's  
dreadful.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

RES2

**Biggy's, 479 Wilmslow Road, Manchester M20 4AN**

**Premises Licence Application**

**Reference 265935/PW5**

**Proposal:**

Fast food takeaway and delivery service.

Proposed hours and licensable activities:

Provision of late night refreshment:

Sun to Thu 11pm to 2am, Fri to Sat 11pm to 4am

Christmas Eve, Christmas Day, New Year's Eve New Year's Day 11pm to 4am

Opening hours:

Sun to Thu 11am to 2am, Fri to Sat 11am to 4am

Christmas Eve, Christmas Day, New Year's Eve New Year's Day 11am to 4am

## **Response on behalf of Withington Civic Society Planning Group**

1. Withington Civic Society Planning Group **opposes the application in full.**

The Society is very keen to see new businesses in the area. However, in terms of the licence application, the key matter for consideration is Manchester City Council's Statement of Licensing Policy 2021-2026.

On page 29 of the policy there are the following provisions:

***"Special policy in respect of Withington Stress Area***

***5.16 There is evidence that the promotion of the licensing objectives within an identified area of Withington is being undermined as a consequence of the operation of licensed premises in the***

***area, having regard to the complaints of local residents and the level of crime and disorder and public nuisance within it***

***5.17 The licensing authority considers that although the level of problems do not currently justify the implementation of a cumulative impact and saturation policy for the area, the area is of concern and shall be kept under review***

***5.18 Therefore the Council has adopted a Special Policy for the area, which shall be known as the Withington Stress Area.....”***

There is reference to a map in Appendix 8 of the document. The relevant premises fall squarely within the designated area. The document continues....

***“5.19 This Policy has been reviewed and updated analysis of the Policy area shows that there is still a higher proportion of incidents in this area and the level of issues remains broadly consistent since the policy came into effect, with increases in victim-based crime and violent crime. Although levels of antisocial behaviour, including that recorded as alcohol related, decreased in 2013/2014, it subsequently increased in 2014/2015. Therefore the authority considers it appropriate to retain the Policy for the ‘Withington Stress Area’ as it stands.***

***5.20 Withington is a residential area which, if not carefully planned, may attract late-night venues that cannot be set up in Fallowfield due to a CIP there. It is noted that while Withington suffers less antisocial behaviour than Fallowfield, there is evidence of problems associated with operation of licenced premises in Withington, and the licensing authority does not wish to see an increase in antisocial behaviour.”***

The document then sets out the relevant approach for new licences. After dealing with other types of establishments the following provision is made:

Closing Time	Approach
Hot food takeaway premises	Strong presumption against. A genuinely exceptional case would need to be shown. The reasons for the exception should be shown in the operating schedule, and must demonstrate that there will be no harm to the licensing objectives, including from departing customers

2. This application seeks a licence for fast food takeaway and delivery until 4 am on Fridays and Saturdays, and until 2 am every other night of the week. There must be a strong presumption against granting such a licence - in accordance with the paragraph above. Further, there is no good reason why such a licence should be granted, and to do so would be contrary to the Council's stated policy for all the reasons given.
3. Of relevance also are the following points:
  - Litter in the area is already a problem and getting worse.

- The incidence of anti social behaviour in the immediate area is getting worse with on street drinking, late night /all night parties by young people living in HMOs.
  - The problems of for example Fallowfield are working their way into Withington. The policy mentioned above was specifically designed to avoid this happening
4. Whatever steps the applicant may take, the overwhelming probability is that the existence of yet another fast food takeaway in this part of Withington will only exacerbate the problems associated with such premises as identified in the Policy quoted above.

**Therefore the application should be refused.**

**[REDACTED]**

**For and on behalf of Withington Civic Society Planning Group**

**4.12.2021**

**RES3**

**From:** Fallowfield Community Guardians <[REDACTED]>  
**Sent:** 07 December 2021 15:28  
**To:** Premises Licensing <Premises.Licensing@manchester.gov.uk>  
**Subject:** Re: Premises Licence (new) 265935/PW5: Biggy's, 479 Wilmslow Road, Manchester, M20 4AN, (Withington ward)

Dear Sirs

I write on behalf of Fallowfield & Withington Community Guardians to object to the application for a late night licence at Biggy's, 479 Wilmslow Road, as agreed at our meeting this morning (December 7th, 10am).

We have seen the submission by Withington Civic Society and agree with all of their points. We agree that the litter situation is already terrible in both Fallowfield and Withington due to the high concentrations of takeaway premises along Wilmslow Road. The hours requested in this application are much later than most of the licenced premises in Withington village. We feel that another late night license will undermine the licensing objectives particularly in relation to public nuisance. We do not feel that the measures suggested by the applicant will be sufficient and that if this licence is granted it will add further nuisance in an area covered by the Withington Licensing Stress Policy area, as detailed in the Withington Civic Society objection.

We respectfully ask that you refuse this application because this area is already suffering from the cumulative impact of so many licenced premises.

Yours

[REDACTED]  
[REDACTED]

**RES4**

**From:** [REDACTED] >  
**Sent:** 08 December 2021 10:59  
**To:** Premises Licensing <Premises.Licensing@manchester.gov.uk>  
**Subject:** Biggy Eat Ltd, 479 Wilmslow Road, M20 4AN

I write in support of the above application to have late opening hours. This business has a reputation of a calm and collected business. It has never caused any issues in the past 2 years of trading. I have always brought my kids in to dine and never had any issues. It is also a bonus that they do not serve alcohol as that prevents the increase in crime and disorder. Allowing them to open till later would also deter thefts and other crimes as people may be more vary.

I write in support and believe this will be an asset to Withington and surrounding areas.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**Sent:** 09 December 2021 12:34  
**To:** Premises Licensing <Premises.Licensing@manchester.gov.uk>  
**Subject:** Re: Premises Licence application 265935PW5: Biggy's, 479 Wilmslow Road, Manchester, M20 4AN

Hi,

I agree to the following terms to be implemented.

Regards

Sent from my iPhone

On 9 Dec 2021, at 11:46, Premises Licensing <Premises.Licensing@manchester.gov.uk> wrote:

Good morning

Further to your representation regarding this application, the applicant has proposed the following amendments to the application:

- We shall limit our footfall trading hours to 11pm, however, we intend to offer a strictly delivery only service after 11pm.
- Shutters at the front of the building will be closed promptly at 11pm daily.

- We will offer our delivery only service till 2am including the weekend, rather than 4am stated on the application.

Please reply to this email stating whether you agree with the proposed changes and that on this basis your representation is now withdrawn. Should all representations be withdrawn, it will not be necessary to hold a hearing and agreed changes will be incorporated into the licence.

Should you wish to discuss the matter further with the applicant, please use the contact details in his email below.

Regards

Patrick Ware

RES5

From: [REDACTED]

Sent: 08 December 2021 22:45

To: Premises Licensing <Premises.Licensing@manchester.gov.uk>

Subject: Premises Licence (New) 265935/PW5, Biggy's, 479 Wilmslow Road, Manchester, M20, 4AN

Dear Sir/Madam,

Re: Premises Licence (New) 265935/PW5, Biggy's, 479 Wilmslow Road, Manchester, M20, 4AN - Withington.

I am writing on behalf of South East Fallowfield Residents' Group (SEFRG) to object to the above application for a late licence.

These premises fall within the Stress Policy area which recognises the damage caused by the sheer density of licences in this area. If this licence is granted it will definitely bring more public nuisance to the area and therefore undermine the licensing objectives. Very late licences at takeaway premises usually attract people on their way home from a night out, these people often go out in groups and are usually under the influence of alcohol and, because of this, they are less concerned about noise levels or litter disposal than they would normally be. There are no measures the applicant can take which would stop this public nuisance and any additional problems are unacceptable bearing in mind the pre-existing problems in our area.

Almost all the residents in our group live in the Withington ward and they are absolutely fed up with the noise and rubbish caused by late night trading. We have quarterly residents' meetings and I myself have never attended a meeting where these problems have **not** been mentioned. As I am writing this email to you (at 22.25) a very large group of approximately 40 people have just walked (noisily) past our house, there is no doubt in my mind that later on tonight many of them will wind up in the local takeaways and drop their rubbish in our gardens, hedges and roads on their way home and we will probably be woken up. This is the sad reality of living in this area... and this is the type of behaviour which continues to drive long term residents out of here.

We urge you to reject this application in full.

Yours faithfully,

[REDACTED]  
[REDACTED]