

CITY OF WOLVERHAMPTON COUNCIL	Statutory Licensing Sub-Committee 2 April 2019
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Time 10.00 am **Public Meeting?** YES **Type of meeting** Regulatory
Venue Committee Room 3, 3rd Floor, Civic Centre

Membership

Chair Cllr Alan Bolshaw (Lab)

Labour

Cllr Rita Potter

Conservative

Cllr Wendy Thompson

Quorum for this meeting is two Councillors.

Information for the Public

If you have any queries about this meeting, please contact the Democratic Services team:

Contact Kirsty Tuffin, Democratic Services Officer
Tel/Email Tel: 01902 552873 Email: kirsty.tuffin@wolverhampton.gov.uk
Address Democratic Services, Civic Centre, 1st floor, St Peter's Square,
Wolverhampton WV1 1RL

Copies of other agendas and reports are available from:

Website www.wolverhampton.moderngov.co.uk1
Email democratic.services@wolverhampton.gov.uk
Tel 01902 550320

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Some items are discussed in private because of their confidential or commercial nature. These reports are not available to the public.

Agenda

Part 1 – items open to the press and public

<i>Item No.</i>	<i>Title</i>
1	Apologies for absence
2	Declarations of interest
3	Licensing Act 2003 – Application for a Review of a Premises Licence in respect of The Swan Hotel, 17 Lower Street, Wolverhampton, WV6 9AA (Pages 3 - 26)

CITY OF WOLVERHAMPTON COUNCIL	Statutory Licensing Sub-Committee 2 April 2019
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Report title	Licensing Act 2003 – Application for a Review of a Premises Licence in respect of The Swan Hotel, 17 Lower Street, Wolverhampton, WV6 9AA	
Wards affected	Tettenhall Regis Ward	
Accountable director	Ross Cook – City Environment	
Originating service	Licensing	
Accountable employee(s)	Michelle James Tel Email	Licensing Policy Manager 01902 556796 michelle.james@wolverhampton.gov.uk
Report to be/has been considered by	None	

Recommendation for decision:

The Statutory Licensing Sub-Committee is recommended to:

1. Consider this application for a review of a premises licence.

1.0 Purpose

- 1.1 To submit for consideration by the Statutory Licensing Sub-Committee an application for a review of a premises licence.

2.0 Background

- 2.1 The current premises licence is attached at **Appendix 1**.

3.0 Review Application

- 3.1 An application was received from The Home Office on 6 February 2019 for a review of the premises licence in respect of The Swan, 17 Lower Street, Wolverhampton, WV6 9AA. The review was brought under the licensing objective of Crime and Disorder.
- 3.2 The premises location is Tettenhall Regis ward and a plan is attached at **Appendix 2**.
- 3.3 A copy of the review application is attached at **Appendix 3**. The review has been brought in support of the Prevention of Crime and Disorder licensing objectives. Supporting evidence is detailed within the review application.
- 3.4 Representations have been received from the following:
- West Midlands Police
 - Licensing Authority

These representations can be found at **Appendix 4** and **Appendix 5**.

- 3.5 The notice of review has been properly served on all the Responsible Authorities. The Council has complied with the legislative process and displayed the appropriate notice at the premises and on its website as required, when the application for review was made.
- 3.6 The applicant for review, the current premise licence holder, and those who have made representations have all been invited to attend the review hearing.

4.0 Financial implications

- 4.1 There is no fee for the application of a Review, and there are no direct financial implications arising from this report. The fees and charges in relation to the Licensing Act 2003 are set by the Secretary of State. This was noted by the Licensing Committee on 24 January 2018. [MK/14032019/B]

5.0 Legal implications

- 5.1 Section 51 of the Licensing Act 2003, as amended states that a responsible authority or any other person may apply to the relevant Licensing Authority for a review of a licence.

5.2 The Licensing Sub-Committee when determining an application for review, pursuant to Section 52 of the Licensing Act 2003 has power to take any of the following steps (if any) as it considers necessary for the promotion of the “licensing objectives” listed at 5.3.

- (a) Modify the conditions of the licence;
- (b) Exclude a licensable activity from the scope of the licence;
- (c) Remove the designated premises supervisor;
- (d) Suspend the licence for a period not exceeding 3 months;
- (e) Revoke the licence.

5.3 The four licensing objectives are:

- The prevention of crime and disorder;
- Public safety;
- The prevention of public nuisance;
- The protection of children from harm.

5.4 In addition, regard shall be had to guidance issued by the Secretary of State under Section 182 of the Licensing Act 2003 and Wolverhampton City Council’s Licensing Policy Statement. [SH/14032019/B]

6.0 Equalities implications

6.1 There are no direct equalities implications associated with this report

7.0 Environmental implications

7.1 This report has environmental implications in that there is a potential for disturbance caused by patrons using the premises and nuisance caused by litter and waste originating from the premises

8.0 Human resources implications

8.1 There are no human resources implications associated with this report.

9.0 Corporate landlord implications

9.1 There are no corporate landlord implications associated with this report.

10.0 Appendices

- 10.1 Appendix 1 – Application for Review
- Appendix 2 – Location Plan for the Ward
- Appendix 3 – Copy of Home Office Review Application
- Appendix 4 – Representation from West Midlands Police
- Appendix 5 – Representation from City of Wolverhampton Council (Licensing)

Premises Licence

Issued in accordance with The Licensing Act 2003

Name of Premises: The Swan Hotel

Address of Premises: 17 Lower Street
Tettenhall
Wolverhampton
WV6 9AA

Premises Licence Number: 19/01071/PREDPS– Variation of Premises DPS

Date Licence Granted: 12th December 2018

1. Opening hours of the premises

Normal Hours: Sunday to Monday 0900 to 0000 hours
Tuesday 1000 to 0100 hours
Wednesday 0900 to 0000 hours
Thursday to Saturday 0900 to 0100 hours

Seasonal Variations: On St. David's Day, St. Patrick's Day, St. Georges Day, and St. Andrew Day, the finish time will be extended by one hour, with seven days notice and agreement with the police.

Non Standard Hours: For statutory bank holiday weekend periods (Friday, Saturday, Sunday and Monday) and for the Thursday before Good Friday and for Christmas Eve, the finish time will be extended by one hour beyond these times.
Notwithstanding these usual opening times, the premises, in accordance with the converted right, may chose to open to the public at any time for non-licensable activities/purpose.

2. Licensable activities authorised by the licence and the times the licence authorises the carrying out of these activities

Activity: **Live Music**

Normal Hours: Sunday to Monday 1000 to 2330 hours
Tuesday 1000 to 0030 hours
Wednesday 1000 to 2330 hours
Thursday to Saturday 1000 to 0030 hours

Seasonal Variations: On St. David's Day, St. Patrick's Day, St. Georges Day, and St. Andrew Day, the finish time will be extended by one hour, with seven days notice and agreement with the police.

Non Standard Hours: For statutory bank holiday weekend periods (Friday, Saturday, Sunday and Monday) and for the Thursday before Good Friday and for Christmas Eve, the finish time will be extended by one hour beyond these times.

Activity: **Recorded Music**

Normal Hours: Sunday to Monday 1000 to 2330 hours
Tuesday 1000 to 0030 hours
Wednesday 1000 to 2330 hours
Thursday to Saturday 1000 to 0030 hours

Seasonal Variations: On St. David's Day, St. Patrick's Day, St. Georges Day, and St. Andrew Day, the finish time will be extended by one hour, with seven days notice and agreement with the police.

Non Standard Hours: For statutory bank holiday weekend periods (Friday, Saturday, Sunday and Monday) and for the Thursday before Good Friday and for Christmas Eve, the finish time will be extended by one hour beyond these times.

Activity: **Activity like music or dance**

Normal Hours: Sunday to Wednesday 1000 to 2330 hours
Thursday to Saturday 1000 to 0030 hours

Seasonal Variations: On St. David's Day, St. Patrick's Day, St. Georges Day, and St. Andrew Day, the finish time will be extended by one hour, with seven days notice and agreement with the police.

Non Standard Hours: For statutory bank holiday weekend periods (Friday, Saturday, Sunday and Monday) and for the Thursday before Good Friday and for Christmas Eve, the finish time will be extended by one hour beyond these times.

Activity **Late Night Refreshment**

Normal Hours: Sunday to Monday 2300 to 2330 hours
Tuesday 2300 to 0030 hours
Wednesday 2300 to 2330 hours
Thursday to Saturday 2300 to 0030 hours

Seasonal Variations: On St. David's Day, St. Patrick's Day, St. Georges Day, and St. Andrew Day, the finish time will be extended by one hour, with seven days notice and agreement with the police.

Non Standard Hours: For statutory bank holiday weekend periods (Friday, Saturday, Sunday and Monday) and for the Thursday before Good Friday and for Christmas Eve, the finish time will be extended by one hour beyond these times.

Activity: **Sale/Supply of alcohol on the premises**

Normal Hours: Sunday to Monday 1000 to 2330 hours
Tuesday 1000 to 0030 hours
Wednesday 1000 to 2330 hours
Thursday to Saturday 1000 to 0030 hours

Seasonal Variations: On St. David's Day, St. Patrick's Day, St. Georges Day, and St. Andrew Day, the finish time will be extended by one hour, with seven days notice and agreement with the police.

Non Standard Hours: For statutory bank holiday weekend periods (Friday, Saturday, Sunday and Monday) and for the Thursday before Good Friday and for Christmas Eve, the finish time will be extended by one hour beyond these times.

Activity: **Sale/Supply of alcohol off the premises**

Normal Hours: As per 'On' Sales

Seasonal Variations: As per 'On' sales

Non Standard Hours: As per 'On' Sales

3. Name of the designated premises supervisor if the sale of alcohol is involved

Jamie Paul Hancock
Personal licence number: PER3044
Issued by City of Wolverhampton Council

4. Is access to the premises by children restricted or prohibited

Provision only as prohibited or restricted under the Licensing Act 2003.
Children to be accompanied by a responsible adult at all times.

5. Name, (registered) address of the holder of the premises licence

Punch Taverns Limited
Jubilee House
Second Avenue
Burton-on-Trent
DE14 2WF

Mandatory Licensing Conditions (Licensing Act 2003)

Mandatory conditions as required by the Act will apply to the licence.

It is the responsibility of the Premises Licence Holder and the Designated Premises Supervisor to ensure that they are conversant and compliant with all current mandatory conditions in relation the Licensing Act 2003.

Conditions consistent with the Operating Schedule

Historic Permissions consistent with the Justices Licence as converted under the Licensing Act 2003

Provision of substantial refreshment

Hot food or hot drinks may be provided in line with alcohol sales with an additional thirty minutes thereafter.

Recorded Music

- The playing of recorded music in the premises is permitted 24 hours a day pursuant to Section 182 of the Licensing Act 1964

Private Entertainment

- The provision of private entertainment for private gain is permitted 24 hours a day pursuant to Section 2 (2)(b) of the Private Places of Entertainment (Licensing Act) 1967.

Sale of Alcohol to residents

These premises are entitled to sell alcohol to residents and supply their bona fide guests 24 hours a day pursuant to section 63(2) LA 1964.

New Years Eve

The Regulatory Reform (Special Occasions Licensing) Order 2002.

- Where this licence does not otherwise permit, on New Years Eve these hours may be extended from the end of licensed hours on New Years Eve to the start of licensed hours on New Years Day.

General

We have applied for an extended period between the cessation of the supply and the closure of the premises to give us the option to allow for a more gradual dispersal of customers. The style and operation of the pub will not differ significantly during the extended hours. Where this is appropriate, non-alcoholic refreshment will be available in the extended period.

The premises will respect Spirit Group's Approach to Responsible Drinking (a copy of which is enclosed in support of this application). Our policies change at regular intervals to reflect current trends and it would be inappropriate to standardise them on a permanent basis. The enclosed policy is included for information only and not as suggested conditions or to form part of any other Operating Schedule.

Any part of the variation application dated 17 April 2007 that changes the plan/layout at the premises to be of no effect until the work has been completed.

The prevention of crime and disorder

- When door supervisors are engaged they will be SIA approved.
- A zero tolerance towards illegal drugs will be enforced at all times.
- If a disc jockey is used on any night then he/she will ask customers to leave quietly.
- If a CCTV system is installed at this site, it will continue to operate during the additional hours of trading and notices will be displayed.

All instances of crime and disorder will be reported to the police and will be kept in an incident log book.

Public safety

- Public safety is integral to the way that the Spirit Group runs its business and is reviewed regularly through our health and safety policy.
- This policy is fully briefed and trained to all to all management and staff and we will continue to train our staff to the standards required by relevant legislation.
- Free drinking water will be available at all times.
- A fire alarm system will be provided in accordance with the Fire service letter of recommendations and appropriate certification will be provided.
- The emergency lighting system will be extended in accordance with the Fire Service letter of recommendations and appropriate certification will be provided.
- Item 1.1, 1.2 and 1.3 of the Fire Services letter of recommendation will be complied with.
- The surface finishes within the licence areas will be in accordance with the Fire Service letter of recommendations.
- New furnishings will be purchased in accordance with the Fire Service letter of recommendations and appropriate certification will be provided.
- The occupancy of the premises will be restricted to 150 persons within the building.
- The occupancy will only be increased if 50 percent of the removable tables and chairs are stored away from the licensed areas and associated means of escape. Under such circumstances the occupancy will be increased to 200 persons.

The prevention of public nuisance

- Additional patrols will take place by members of staff. internally and externally, to limit any noise pollution when entertainment is being offered within the premises.
- If appropriate, notices will be displayed asking our customers to respect our neighbours when leaving the premises.
- Where already used text/radio pagers will continue to be used for the additional hours of trading and will be monitored by a responsible member of staff.
- Soft drinks and non-alcoholic refreshment will be available if we decide to use the option to stay open for an extended period between the cessation of the supply of alcohol and the closure of the premises (see above under General).
- Noise and vibration is not to emanate from the premises and/or rear garden area, so as to cause a nuisance to nearby residents.

The protection of children from harm

When children are allowed upon the premises, any entertainment offered within the premises will be suitable for young persons.

- Children will be required to be supervised by the accompanying adult at all times.

- A no smoking area will be provided.
- Soft drinks and non-alcoholic drinks will be available.
- A recognised Proof of Age Policy will be enforced

Conditions attached after a hearing by the Licensing Authority

Noise and vibration to not emanate from the premises so as to cause a nuisance to nearby premises.

All windows and doors to remain closed during periods of regulated entertainment except for access and egress from the premises.

Prominent, clear and legible notices to be displayed at all exits requesting the public to respect the needs of local residents and to leave the premises and the area quietly.

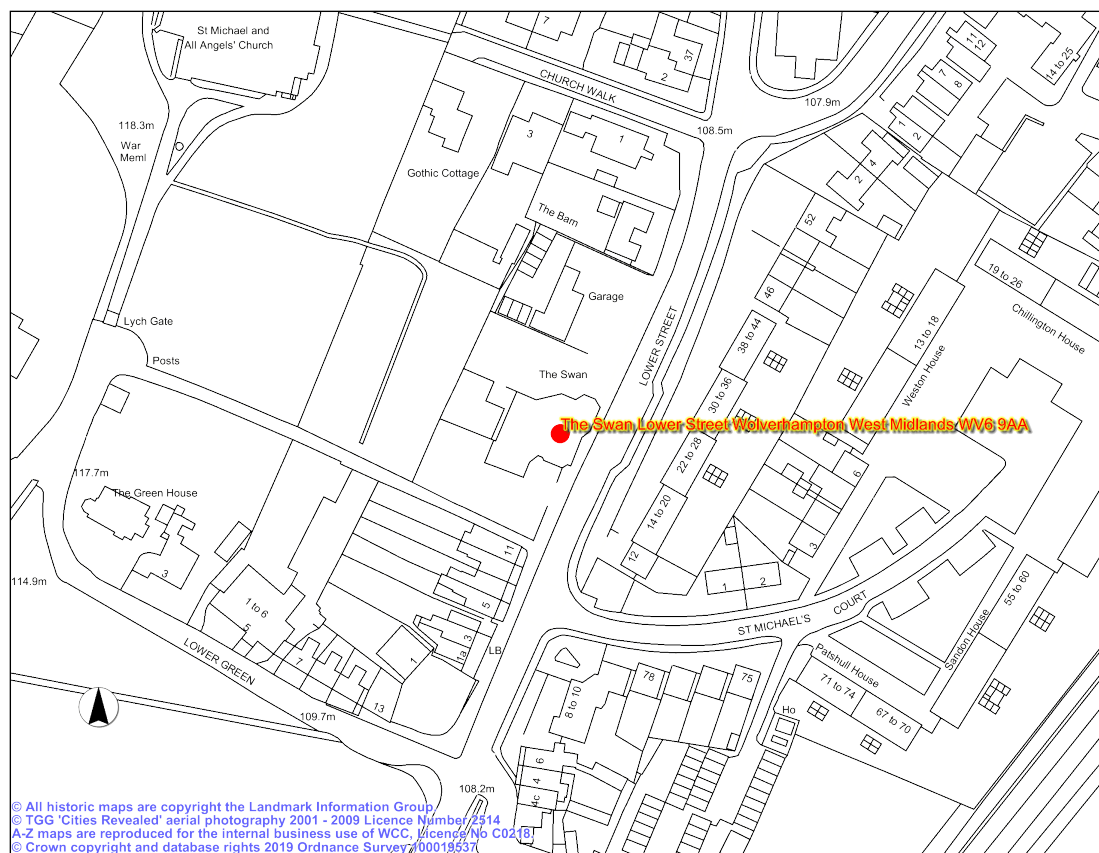
At all times when regulated entertainment takes place, all electrical equipment used for the provision of public entertainment must be protected by residual current device having a nominal tripping level of 30 mA. This may be fitted either to the electrical circuit supplying the sockets used or directly on the sockets used.

Prominent, clear and legible signs to be displayed on the car park stating that the car park is to be used by patrons of the Swan Hotel only.

Cut off sensors to be fitted to the fire door to prevent noise emanating from the premises should the door be opened.

Plans

As submitted with application dated 23/05/2007 and retained by Wolverhampton City Council.



CITY OF
WOLVERHAMPTON
COUNCIL

*The Swan, 17 Lower
Street, Wolverhampton,
WV6 9AA*

Wolverhampton City Council
Asset Management
Civic Centre
St Peters Square
Wolverhampton
WV1 1RL

Plan Produced
11.3.2019
Scale 1:1,250

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**CITY OF
WOLVERHAMPTON
COUNCIL**

Licensing Services, 2nd Floor, Civic Centre, St. Peter's Square, Wolverhampton, WV1 1SH

**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 Stephanie Swann

(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
THE SWAN, 17 LOWER STREET, WOLVERHAMPTON, WV6 9AA

Post town Wolverhampton

Post code (if known) WV6 9AA

Name of premises licence holder or club holding club premises certificate (if known)
Punch Taverns Limited

Number of premises licence or club premises certificate (if known)
WN/044331

Part 2 - Applicant details

I am

Please tick ✓ yes

I) an individual, body or business which is not a responsible authority (please read guidance note I, 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 Stephanie Swann West Midlands Immigration Enforcement Sandford House 41 Homer Road Solihull B91 3QJ
Telephone number (if any) [REDACTED]
E-mail address (optional) [REDACTED]

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 ✓

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

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

Grounds for Review: Crime and Disorder: Individual encountered illegally working at the premises with no right to work in the UK.

Immigration enforcement has 'responsible authority' status under the Licensing act 2003. The guidance states that "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 suspension or revocation of the license- even in the first instance should be seriously considered".

Additionally, illegally working:

Illegal working has damaging social and economic consequences for the UK. It undercuts businesses that operate within the law, undercuts British workers, and exploits migrant workers. As long as there are job opportunities for illegal workers, the UK will be an attractive place for illegal migrants.

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

Immigration Enforcement has 'responsible authority' status under the Licensing act 2003.

West Midlands Immigration enforcement team had received information that illegal working was taking place at the premises.

On 11/12/2018 West Midlands ICE visited the premises to act on the information received. The premises were entered under section 179(3) of the Licensing act 2003 due to the premises holding an Alcohol license.

There were 4 individuals present during the visit, one being the owner of the premises. Officers interviewed both individuals in the kitchen and found one of them to have no status in the UK.

The Individual was arrested and detained under schedule 2 Paragraph 17 (1) of the Immigration act (1971) (AA) as he was found to have committed an offence under section 24 (1)(b)(i) of the Immigration act 1971 (AA).

An Illegal working interview was conducted with both the employee and employer. The employee stated that he had been working at the premises 3 months getting paid £200 a week cash in hand. The employer also confirmed that the individual had been working 3 months.

Because of this a referral was made to the civil penalty team due to the employer employing persons with no right to work in the UK. A referral notice was left with the employer [REDACTED]

The civil penalty team have confirmed that they will be pursuing a fine of £15,000 as there is no evidence the employer carried out the relevant checks.

Immigration enforcement has 'responsible authority' status under the Licensing act 2003. The guidance states that "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 suspension or revocation of the license- even in the first instance should be seriously considered".

Additionally, illegally working:

Illegal working has damaging social and economic consequences for the UK. It undercuts businesses that operate within the law, undercuts British workers, and exploits migrant workers. As long as there are job opportunities for illegal workers, the UK will be an attractive place for illegal migrants.

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

Please tick ✓ yes

☐

If yes please state the date of that application

Day	Month	Year
<input type="text"/>	<input type="text"/>	<input type="text"/>

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

Please tick ✓

yes

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

IT IS AN OFFENCE, UNDER SECTION 158 OF THE LICENSING ACT 2003, TO MAKE A FALSE STATEMENT IN OR IN CONNECTION WITH THIS APPLICATION. THOSE WHO MAKE A FALSE STATEMENT MAY BE LIABLE ON SUMMARY CONVICTION TO A FINE OF ANY AMOUNT.

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



10 SWANN

Date

02/02/2019

6/2/19

Capacity **Immigration Officer (15222)**

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

Post town

Post Code

Telephone number (if any)

If you would prefer us to correspond with you using an e-mail address your e-mail address (optional) stephanie.swann@homeoffice.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.

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: WV Licensing <wv_licensing@west-midlands.pnn.police.uk>

Sent: 13 February 2019 15:50

To: Licensing <Licensing@wolverhampton.gov.uk>

Subject: RE: Review of premises licence -The Swan Hotel, 17 Lower Street, Wolverhampton, WV6 9AA

Please take this as notification of West Midlands Police representations regarding this case.

WMP make representations under the prevention of crime and disorder, in so much that it is a criminal offence to employ illegal workers.

Regards,

Steph Reynolds

PS 6222

Licensing

Partnerships Team

WV NPU

External Tel 01902 649 085

Internal Tel 871 3196

[REDACTED]

[REDACTED]

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Subject: Review of premises licence -The Swan Hotel, 17 Lower Street, Wolverhampton, WV6 9AA

“11.27 There is certain criminal activity that may arise in connection with licensed premises which should be treated particularly seriously. These are the use of the licensed premises:

- for the sale and distribution of drugs controlled under the Misuse of Drugs Act 1971 and the laundering of the proceeds of drugs crime;
- for the sale and distribution of illegal firearms;

- for the evasion of copyright in respect of pirated or unlicensed films and music, which does considerable damage to the industries affected;
- for the illegal purchase and consumption of alcohol by minors which impacts on the health, educational attainment, employment prospects and propensity for crime of young people;
- for prostitution or the sale of unlawful pornography;
- by organised groups of paedophiles to groom children;
- as the base for the organisation of criminal activity, particularly by gangs;
- for the organisation of racist activity or the promotion of racist attacks;
- for employing a person who is disqualified from that work by reason of their immigration status in the UK;
- for unlawful gambling; and
- for the sale or storage of smuggled tobacco and alcohol.

11.28 It is envisaged that licensing authorities, the police, the Home Office (Immigration Enforcement) and other law enforcement agencies, which are responsible authorities, will 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.”

Councillors may conclude from the evidence given within the review application and at the hearing in order to promote the licensing objective of Crime and Disorder that modification of the premises licence or suspension of the licence to ensure the current management of the premises fully understands their roles and responsibilities is not a suitable option and that there is no alternative but to revoke the licence.

The Licensing Authority fully supports the review application brought by the Home Office and concludes the above issues should be resolved in order to promote the licensing objective of Crime and Disorder.

I shall be in attendance at the hearing should councillors have any questions or require any further assistance.

Chris Howell
Licensing Manager
Tel. Office: 01902 554554

[E-mail: Chris.Howell@wolverhampton.gov.uk](mailto:Chris.Howell@wolverhampton.gov.uk)
City of Wolverhampton Council