

Dealing With The Problems Of Late Night Drinking A Home Office Consultation For The Late Night Levy And Early Morning Restriction Orders

Summary

1. This consultation is about two measures in the Police Reform and Social Responsibility Act 2011 ("the 2011 Act") that will be implemented through regulations: Early Morning Restriction Orders (EMROs) and the late night levy (the levy). The Government states that it believes that problems in the night-time economy should be addressed locally and that it is committed to ensuring that the police and local authorities are given the right tools to address the alcohol-related problems in their area, whilst promoting a vibrant night-time economy to benefit business and the community that they serve.
2. The levy and the extension of EMROs are tools that the Government believe will enable local authorities to achieve this. Nationally the majority (64%) of all violence occurs in the evening or at night and one-fifth of all violent incidents take place in or around a pub or club. By extending EMROs so that they can be applied from midnight, local authorities will have an additional tool to address problem areas in the night time economy.
3. Where there is a vibrant late night economy, with premises remaining open into the early hours, then the local authority should have the flexibility to charge for a contribution towards any additional policing that this generates. Tax payers should not simply be left to pick up this cost. People who enjoy a night out often visit a variety of premises and it is appropriate that the costs are shared between these businesses.
4. The consultation seeks views on the details of the regulations that will implement these policies. In particular, it asks for views on what categories of premises should enjoy exemptions and reductions under both measures to avoid unfairly penalising premises which are not part of the wider late night economy.
5. The Consultation Document and the accompanying Impact Assessment can be found at <http://www.homeoffice.gov.uk/publications/about-us/consultations/late-night-drinking/>. The consultation closes on 10th April 2012.
6. Appendix One details the draft proposed response from the Safer Stockton Partnership.

Recommendations

7. That the Safer Stockton Partnership approve the draft response to the consultation at Appendix One
8. That the Safer Stockton Partnership considers that if a late night levy should be introduced in Stockton that the income raised should be pooled and that the Alcohol Crime & Disorder Group determine how the money raised is spent to best meet local needs subject to any statutory requirements imposed by the Regulations.

Detail

9. This consultation is about two measures in the Police Reform and Social Responsibility Act 2011 that will be implemented through regulations: Early Morning Restriction Orders and the late night levy.
10. Alcohol-related crime and disorder is a serious problem for many communities. The promised "café-culture" from later drinking hours has not materialised. In 2010/11, nationally almost

one million violent crimes were alcohol-related and almost half of surveyed violent crime victims believed the offender to be under the influence of alcohol.

11. It is suggested that EMROs will help licensing authorities to address specific problems caused by the late night supply of alcohol in their areas. An EMRO is a power in the Licensing Act (which has not yet been commenced) that, under existing provisions, would enable licensing authorities to restrict the sale of alcohol in the whole or a part of their areas between 3am and 6am on all or some days. The 2011 Act amends existing provisions to allow EMROs to be applied more flexibly between midnight and 6am.
12. Licensing authorities will be able to make an EMRO in relation to problem areas if they have evidence that the order is appropriate for the promotion of the licensing objectives. However, the Government believes that some types of premises should not be subject to an EMRO.
13. The levy will allow licensing authorities to raise a contribution from late-opening alcohol retailers towards policing the late night economy. It will be a local power that licensing authorities can choose whether to adopt for their areas. The licensing authority will also choose the period during which the levy applies, between midnight and 6am on each night. Non-exempt premises licensed to supply alcohol in this period will be required to pay the levy.
14. Licensing authorities will decide whether any (and, if so, which) of the categories of exemptions and reductions will apply to the levy. The consultation document considers the available categories of premises to which exemptions and reductions will apply. The government is also keen to promote local and business-led initiatives. Many businesses successfully work together in schemes like Best Bar None, Business Improvement Districts (BIDs) and Community Alcohol Partnerships and such schemes can be alternatives to, or complement, EMROs or the levy.

Early Morning Restriction Orders

15. The 2011 Act allows an EMRO to be applied by licensing authorities flexibly between midnight and 6am to restrict the sale of alcohol. Licensing authorities can apply these orders to areas where they consider that restricting the late night supply of alcohol is appropriate to promote the licensing objectives. Before this power is commenced, regulations must be made.
16. The regulations will prescribe details of the process for making an EMRO and the kinds of premises that will be exempt from an EMRO. Appendix Two outlines the proposed process to implement an EMRO.
17. EMROs are designed to address recurring problems with alcohol-related crime and disorder in specific areas. The licensing authority will be able to decide during which hours the EMRO will apply, whether it is applied every day or on particular days; whether it will run for a limited or unlimited period; and whether it will apply to whole or part of the licensing authority's area. In each case, the decision will be based on what is appropriate for the promotion of the licensing objectives.
18. There are some types of premises which the Government propose should not be subject to an EMRO, wherever it is applied. Some businesses, wherever they may be located, would not usually contribute to alcohol-related crime and disorder. For example, a hotel may only serve alcohol to its guests who are staying overnight. As such, the 2011 Act enables the Secretary of State to make regulations which prescribe exemptions to an EMRO by reference to particular kinds of premises or particular days.

19. Many licences have additional authorisations on New Year's Eve to stay open later than usual. The government proposes that EMROs will not apply between midnight on 31st December and 6am on 1st January of each year.
20. Local discretion in setting the EMRO area is paramount, and the intention is to have only a few nationally prescribed exemptions. Some premises may need to vary their licence (to, for example, add a condition via the minor variations process) before an exemption is applicable to them.
21. EMROs will operate to restrict alcohol sales even when a Temporary Event Notice (TEN) is otherwise in effect. Section 172 of the Licensing Act 2003 enables the Secretary of State to make a licensing hours order to relax licensing hours on special occasions. Primary legislation includes provision that, unless the licensing hours order provides otherwise, the EMRO will not be effective to prevent alcohol sales in a period to which the extended hours order applies.
22. The proposed exemptions cover some types of premises where the only customers during the relevant period will be members or their guests; or those who stay overnight; or those who attend for a performance. It is also proposed that there is an exemption for community premises which have demonstrated that they do not need a Designated Premises Supervisor (DPS). It is proposed that the following exemptions will apply to every EMRO:

- Premises with overnight accommodation

Premises at which the sale of alcohol is subject to a condition to the effect that, between midnight and 6am, such sales can only be made to residents for consumption on the premises. This will not exempt hotels and guest houses that serve alcohol to members of the public who are not staying overnight at the premises.

- Theatres and cinemas

Premises at which the sale of alcohol is subject to a condition to the effect that, between midnight and 6am, such sales can only be made to ticket holders or participants in the production for consumption on the premises, when there is otherwise no access to the general public.

- Community premises

Those premises that have successfully applied to remove the mandatory DPS requirement.

- Casinos and bingo halls with a membership scheme

Premises licensed to provide these facilities for gambling under the Gambling Act 2005 with a membership scheme in operation between midnight and 6am.

Late Night Levy

23. The levy will allow licensing authorities to raise a contribution from late opening alcohol retailers towards the policing costs generated by the late night economy. The levy will apply to all premises (on and off-trade), throughout the licensing authority's area, which are authorised to sell or supply alcohol in the time period set by the licensing authority. This can be any time between midnight and 6am. Section 172 of the Licensing Act 2003 permits the Secretary of State to make a licensing hours order to relax licensing hours on special occasions. The Government intends to ensure that this will not result in some premises inadvertently becoming liable to pay the late night levy. The levy will not apply to TENs. The 2011 Act makes provision for the Government to prepare draft regulations before the levy scheme is commenced.

24. Regulations will prescribe details of the process for adopting the late night levy. Appendix Three outlines the proposed process to implement a Late Night Levy.
25. Prior to making a decision to implement the levy, it is intended that the licensing authority will have discussions with the Police and Crime Commissioner (PCC) and local police to decide whether it is appropriate to introduce the levy in its area. If so, the licensing authority must formally consult the PCC, the police, licence holders and others about its decision to introduce the levy. The consultation should ask for views on whether it needs to apply any exemptions or discounts to the levy and detail how it will apportion net levy revenue between the police and licensing authority. The licensing authority will have the final decision in all of these areas.
26. There are some types of premises which licensing authorities may consider should not make a contribution towards late night police costs through the late night levy. To enable local discretion, the levy will allow licensing authorities to select exemptions or reductions that they consider should apply in their area. It is proposed that the following types of business are available as exemptions for licensing authorities to adopt:

- Premises with overnight accommodation

Premises at which the sale of alcohol is subject to a condition to the effect that, between midnight and 6am, such sales can only be made to residents for consumption on the premises. This will not exempt hotels and guest houses that serve alcohol to members of the public who are not staying overnight at the premises.

- Restaurants

Premises that have condition(s) on their licence that have the effect of making clear their status as restaurants run on a permanent, more formal basis.

These could, for example, include conditions which require that, between midnight and 6am:

- i. customers are shown to their table;
- ii. food is provided in the form of substantial table meals that are served and consumed at the table;
- iii. premises primarily serve meals to those eating on them, and
- iv. alcohol is not be supplied to, or consumed on the premises by, any person other than those who are taking substantial table meals and where the consumption of alcohol by such persons is ancillary to taking such meals.

- Theatres and cinemas

Premises at which the sale of alcohol is subject to a condition to the effect that, between midnight and 6am, such sales can only be made to ticket holders or participants in the production for consumption on the premises, when there is otherwise no access to the general public.

- Casinos & Bingo Halls

Premises licensed to provide facilities for gambling under the Gambling Act 2005 with a membership scheme in operation between midnight and 6am.

- Community Amateur Sports Clubs (CASCs)

Those premises that have a relief from business rates by virtue of being a CASC (definition found in Schedule 18 of the Finance Act 2002.)

- Community premises

Those premises that have successfully applied for the removal of the mandatory DPS requirement.

- Country village pubs

Premises within designated rural settlements with a population of less than 3,000 (as appear in the qualifications for rural rate relief).

27. Business Improvement Districts (BIDs), established under the Local Government Act 2003) are a defined area within which businesses pay a fee in order to fund improvements within their boundaries and can prove valuable to business communities. An increasing number of late night or licensed trade BIDs are being established. Some of these schemes may fulfil the purpose of the levy, by raising contributions towards late night services, without the need for local authority intervention. These schemes should be actively encouraged. It is proposed that licensing authorities are able to grant an exemption to those paying a levy as part of a BID where the authority is satisfied that the aims meet a satisfactory crime and disorder focus.
28. Many private members' clubs operate under 'Club Premises Certificates' (CPCs). Alcohol cannot generally be supplied under a CPC for profit or to the general public. Some licensing authorities may consider that private member's clubs in their area should not make a contribution to late night enforcement costs. Should clubs be exempt from the late night levy, the police revenue in the average licensing authority area from the levy will be reduced by approximately 10%.
29. Small Business Rate Relief offers business ratepayers that meet certain criteria the opportunity to receive reductions on their rates bills. The criteria vary slightly in England and Wales but, in general, businesses are typically eligible if they occupy only one property and their rateable value is below a certain level. This may apply, for example, to small local pubs.
30. Some premises may have a one-off late night authorisation on their licence to celebrate the New Year. On the one hand, it could be argued that the ability to host one-off special occasions will not be hindered by the late night levy. Before the levy begins in any area, premises will be able to make a free minor variation to their licence to reduce their hours. On special occasions, they may use a TEN to authorise the sale of alcohol. On the other hand, an exemption for those premises whose only late night authorisation is for New Year will benefit many premises.
31. Licensing authorities may also wish to use the late night levy to promote and support participation in other business-led best practice schemes. These schemes encourage businesses to join together to address some of the negative effects of selling alcohol. The following schemes are recommended as available reduction categories:
 - Members of a locally accredited Best Bar None scheme
 - Members of a locally accredited Pubwatch, Clubwatch or Shopwatch scheme.

The discount can only apply to one of the above three schemes. Criteria to be an applicable scheme:

- i. The local authority is satisfied that the scheme has clear aims and objectives which are subject to a formal statement of intent or a constitution and that it has demonstrated that its members are actively working to reduce crime and disorder.
- ii. Membership is open to all licensed premises within the geographic area.

iii. The scheme has a Chair person and/or Coordinator who is responsible for maintaining verifiable records of membership.

- Those premises which pay an annual individual contribution to a Community Alcohol Partnership in their area.

This definition does not include subsidiaries of companies that pay a contribution on a national level.

- Premises that pay a levy in a Business Improvement District (established under the Local Government Act 2003) where the authority is satisfied that the aims meet a satisfactory crime and disorder focus

30. The best practice schemes referred to above are locally accredited schemes that are part of a national network. It has been suggested that some schemes have been created locally without any national accreditation. Groups of businesses may join together and fund late night services or address specific community problems. Regulations could grant licensing authorities the power to give discounts to schemes that they recognise as effective. Schemes would have to meet readily recognised and measurable benchmarks in order to be capable of qualifying for a discount.
31. It is proposed that there is a 10% discount to the levy for every relevant best practice scheme (up to a maximum of 30%). This is in recognition that many businesses are members of multiple schemes.
32. The consultation also asks if there may be other types of premises that should not be required to contribute fully towards the levy, for example, community-run pubs or others with an established community and social character.

Licensing Authority Levy Revenue

33. There are many different types of local authority-funded services which make the late night economy a more welcoming place to do business. Some examples include taxi marshals, late night town wardens and street cleaning services. The licensing authority can retain up to 30% of the net levy revenue to fund other activities besides policing.
34. It is intended that the proportion of net levy revenue retained by licensing authorities (a maximum of 30%) is used to fund services which tackle alcohol-related crime and disorder, such as taxi marshalling and 'booze buses' that provide assistance to those who otherwise might become victims or offenders. This would not extend to the wider management of the night time economy. For example, it would include the clean-up of the after-effects of alcohol-related crime and disorder, such as broken glass and public urination, but not general clean-up activities, such as the collection of waste from outside fast food restaurants.

Potential Local Impact Of EMROs And The Late Night Levy

35. There are over four hundred premises licensed to sell or supply alcohol within the Borough of Stockton but only approximately 25% of those would be liable to be impacted upon by EMROs or the late night levy. An exercise was completed to determine the potential revenue that could be obtained by the levy that could then be used to address any problems in the night time economy. Tables 1 & 2 below detail the 'closing' times (when they cease the sale or supply of alcohol) and rateable value of premises licensed in Stockton and an indication of the maximum amount that could be raised depending upon the commencement time of the levy.

Table 1 – ‘Closing’ Times And Rateable Values Of Premises Potentially Liable To The Late Night Levy

Potential Fee	Rateable Value							Grand Total	Potential Income
	£299	£768	£1,259	£1,365	£1,493	£2,730	£4,440		
‘Closing’ Hour	Band A 0 - 4300	Band B 4301 - 33,000	Band C 33,001 - 87,000	Band D 87,001 - 125,000	Band E 125,001 And Over	Band D* 87,001 - 125,000	Band E* 125,001 And Over	Grand Total	Potential Income
00:30		5	4		4			13	£14,848.00
01:00	5	24	9	1	2		1	42	£40,049.00
01:30	1		4					5	£5,335.00
02:00	4	25	2		2			33	£25,900.00
03:00	2	6	1		1			10	£7,958.00
03:30	1							1	£299.00
04:00		1	1			1		3	£4,757.00
24 Hours	1				6			7	£9,257.00
Grand Total	14	61	21	1	15	1	1	114	£108,403.00

Table 2 – Maximum Potential Income For Various Start Times Of A Late Night Levy
(assuming all premises are liable to the full levy)

	00:00 Hours - 6:00 Hours	00:30 Hours - 6:00 Hours	1:00 Hours - 6:00 Hours	1:30 Hours - 6:00 Hours	2:00 Hours - 6:00 Hours	3:00 Hours - 6:00 Hours
Levy Hour	Potential Income	Potential Income	Potential Income	Potential Income	Potential Income	Potential Income
00:30	£14,848.00					
01:00	£40,049.00	£40,049.00				
01:30	£5,335.00	£5,335.00	£5,335.00			
02:00	£25,900.00	£25,900.00	£25,900.00	£25,900.00		
03:00	£7,958.00	£7,958.00	£7,958.00	£7,958.00	£7,958.00	
03:30	£299.00	£299.00	£299.00	£299.00	£299.00	£299.00
04:00	£4,757.00	£4,757.00	£4,757.00	£4,757.00	£4,757.00	£4,757.00
24 Hours	£9,257.00	£9,257.00	£9,257.00	£9,257.00	£9,257.00	£9,257.00
Grand Total	£108,403.00	£93,555.00	£53,506.00	£48,171.00	£22,271.00	£14,313.00

36. The amounts shown in the tables above would, in practice, be reduced further as it is likely that some premises would reduce the hours on their licence to ensure that they are not caught by the levy (the impact assessment suggests that this may be 25% of relevant premises), the Government is proposing that they should be able to do this without charge, and the discounts of up to 30% that would be allowed for those participating in various schemes. Currently the majority of premises belong to Stockton Pub Watch which would qualify them for a 10% discount.
37. The system for introducing a late night levy appear to be overly bureaucratic as the process maps provided indicate a period of around 9 months from conception to launch and that some authorities will not raise enough from a levy to make it worthwhile. The Government also expect that many authorities will not find it appropriate to use.
38. It is suggested that the proceeds from the levy, after the licensing authority has deducted the costs of administering the levy, should be split 70% to the Police and 30% to the licensing authority. The Safer Stockton Partnership may wish to agree, that if a late night levy should be introduced, that this income should be pooled and that the Alcohol Crime & Disorder Group determine how the money raised is spent to best meet local needs.
39. EMROs are effectively a similar tool as the Alcohol Disorder Zones (ADZs) that were provided for in previous legislation, although EMROs may cover a wider range of circumstances than ADZs it is likely that they will prove to be as unpopular in practice. For an EMRO to be introduced it has to be determined that late night opening is causing problems that cannot be readily resolved using current enforcement and regulatory sanctions, it is unlikely that most areas would want to 'advertise' such a fact by the implementation of an EMRO.
40. It would probably not be appropriate to consider a late night levy for Stockton at this time. Alcohol fuelled crime and disorder is relatively low in comparison to other areas and the amount of income that could be raised through the levy would be unlikely to lower the rate of crime and disorder by a significant amount.

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Appendix One



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Dear Sir

Dealing With The Problems Of Late Night Drinking A Home Office Consultation For The Late Night Levy And Early Morning Restriction Orders

The Safer Stockton Partnership (SSP) is a thematic arm of Stockton Renaissance which deals with crime, anti-social behaviour and substance misuse related crime and anti-social behaviour. The partnership is made up of the following members:

- Catalyst
- Cleveland Fire Authority
- Cleveland Police
- Cleveland Police Authority (to be replaced by Police and Crime Commissioners in 2012)
- Drugs and Alcohol Action Team
- Durham Tees Valley Probation Trust
- H M Prison Holme House
- the four Local Area Partnership Boards
- Neighbourhood Watch
- Safe in Tees Valley
- Stockton Adult Protection Committee
- Stockton-on-Tees Borough Council
- Stockton Primary Care Trust (to be replaced by GP commissioning consortia in 2013)
- Stockton Youth Offending Service
- Tristar Homes Ltd
- University of Durham Queen's Campus
- the Vela Group
- Victim Support

The comments in this response to the above mentioned consultation are made on behalf of all of the partners.

CONSULTATION QUESTION 1:

Do you think that the proposed processes for Early Morning Restriction Orders include sufficient consultation with those likely to be affected by an EMRO?

RESPONSE: Yes

CONSULTATION QUESTION 2:

The government proposes that EMROs will not apply (i.e. will not restrict alcohol sales) between midnight on 31st December and 6am on 1st January of each year. Do you think that EMROs should apply on New Year's Eve?

RESPONSE: No – the EMRO should not apply on New Year's Eve

CONSULTATION QUESTION 3:

Do you agree or disagree that the categories of premises above should be exempt from EMROs?

RESPONSE: The categories of premises highlighted in the consultation document provide good guidance to authorities as to what would normally be suitable for exemption; however we consider that the application of exemptions should be a local decision judged on the merits of the individual circumstance in each local authority area.

CONSULTATION QUESTION 4:

Do you have any other suggestions on the types of premises that should be considered for an exemption from EMROs?

RESPONSE: Premises suitable for exemption should be considered by the local authority when determining the EMRO bearing in mind their local circumstances.

CONSULTATION QUESTION 5:

Do you think that there should be an option for local residents/ community groups to recommend the implementation of the levy in their area?

RESPONSE: Yes, they should be required to detail the evidence they have available that they believe would justify the implementation of an EMRO in their area.

CONSULTATION QUESTION 6:

Do you agree or disagree that licensing authorities should be able to exempt these premises from the levy?

RESPONSE: The categories of premises highlighted in the consultation document provide good guidance to authorities as to what would normally be suitable for exemption; however we consider that the application of exemptions should be a local decision judged on the merits of the individual circumstance in each local authority area.

CONSULTATION QUESTION 7:

Do you agree or disagree that licensing authorities should be able to exempt Business Improvement Districts from the late night levy?

RESPONSE: Yes

CONSULTATION QUESTION 8:

Do you think that premises operating under a club premises certificate should be exempt from the late night levy?

RESPONSE: The decision if premises operating under a club premises certificate would be suitable for exemption from the levy should be considered by the local authority after due consideration of their local circumstances.

CONSULTATION QUESTION 9:

What are your views on affording a reduction from the late night levy to businesses that receive small business rate relief?

RESPONSE: The decision if premises that receive small business rate relief would be suitable for exemption from the levy should be considered by the local authority after due consideration of their local circumstances.

CONSULTATION QUESTION 10:

Do you agree or disagree that there should be an exemption for New Year's Eve?

RESPONSE: Yes

CONSULTATION QUESTION 11:

Do you agree or disagree that licensing authorities should be able to ask for a reduced levy payment from these businesses?

RESPONSE: The decision if premises who belong to good practice schemes would be suitable for a reduction of the levy should be considered by the local authority after due consideration of their local circumstances. The local authority should also be able to determine the level of reduction appropriate to ensure that the levy can meet local needs.

CONSULTATION QUESTION 12:

Do you have any suggestions for benchmarks that can be applied to grassroots schemes to ensure members are actively working to reduce crime and disorder?

RESPONSE: No

CONSULTATION QUESTION 13:

Do you agree or disagree with this set-up of cumulative discounts?

RESPONSE: Disagree - The local authority should also be able to determine the level of reduction appropriate to ensure that the levy can meet local needs.

CONSULTATION QUESTION 14:

Should there be scope for further exemptions and reductions from the late night levy?

RESPONSE: Yes - The local authority should be able to determine what exemptions and the level of reduction appropriate to ensure that the levy can meet local needs. This should include the ability to exclude geographical areas within the borough, so for instance only one town centre could be covered by the levy.

CONSULTATION QUESTION 15

What activities do you think licensing authorities should be able to fund with their retained proportion?

RESPONSE: The licensing authority should be able to fund any activity that would assist with meeting the four licensing objectives during the period of the levy.

CONSULTATION QUESTION 16:

What restrictions do you think there should be on the types of services that licensing authorities will be able to fund?

RESPONSE: The authority should be able to fund services that prevent and tackle alcohol and crime related disorder and management of the night time economy.

CONSULTATION QUESTION 17:

If you have any comments on the Impact Assessment, please detail them here?

RESPONSE: No comments to make at this point.

CONSULTATION QUESTION 18:

If you are responding on behalf of a licensing authority, how many premises do you expect will be affected by EMROs in your area?

RESPONSE: The maximum numbers of premises likely to be affected is 120.

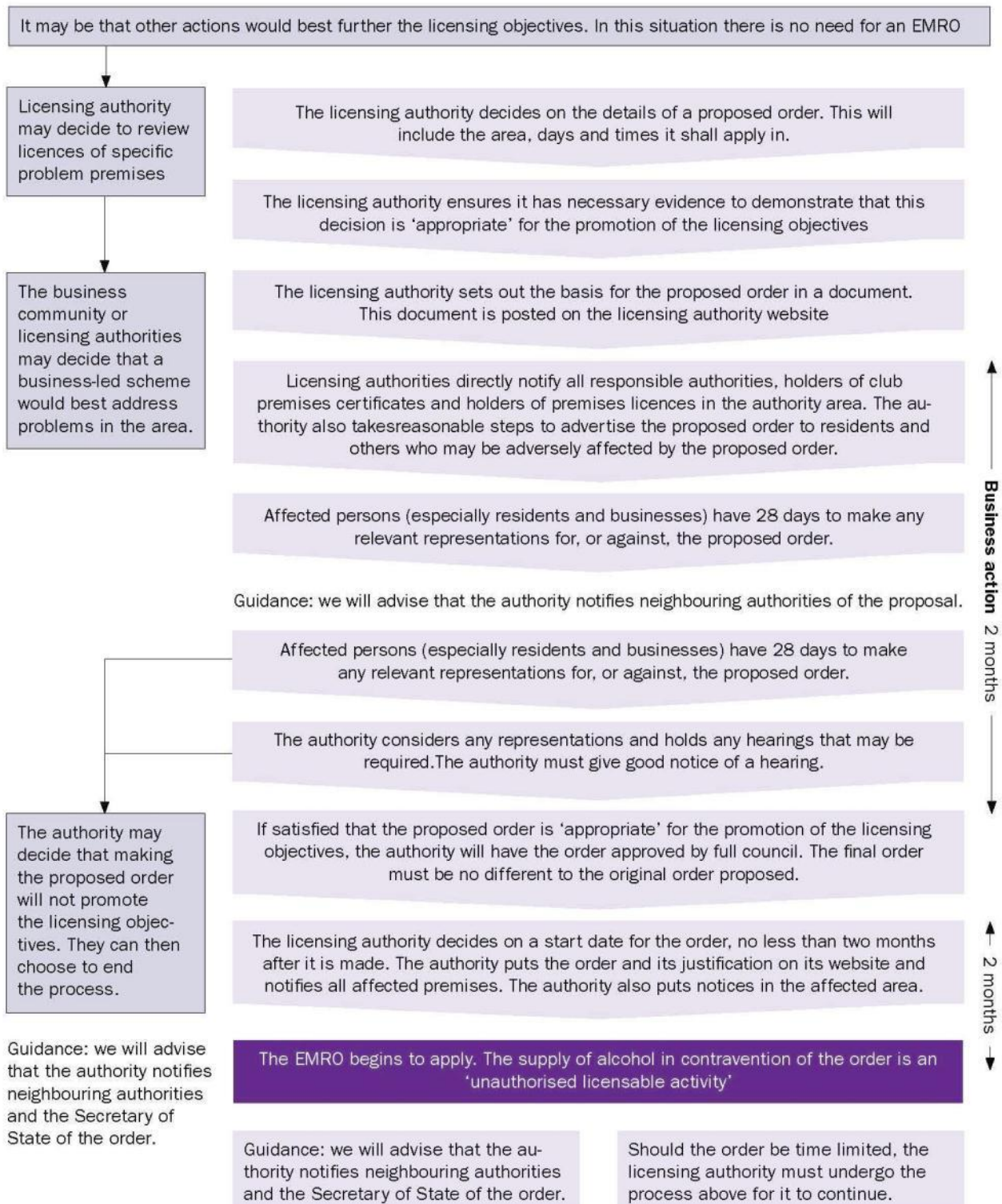
I hope that you find our response to the consultation of benefit. Please feel free to contact me if you require any further information.

Yours Sincerely

Mike Batty
Head of Community Protection

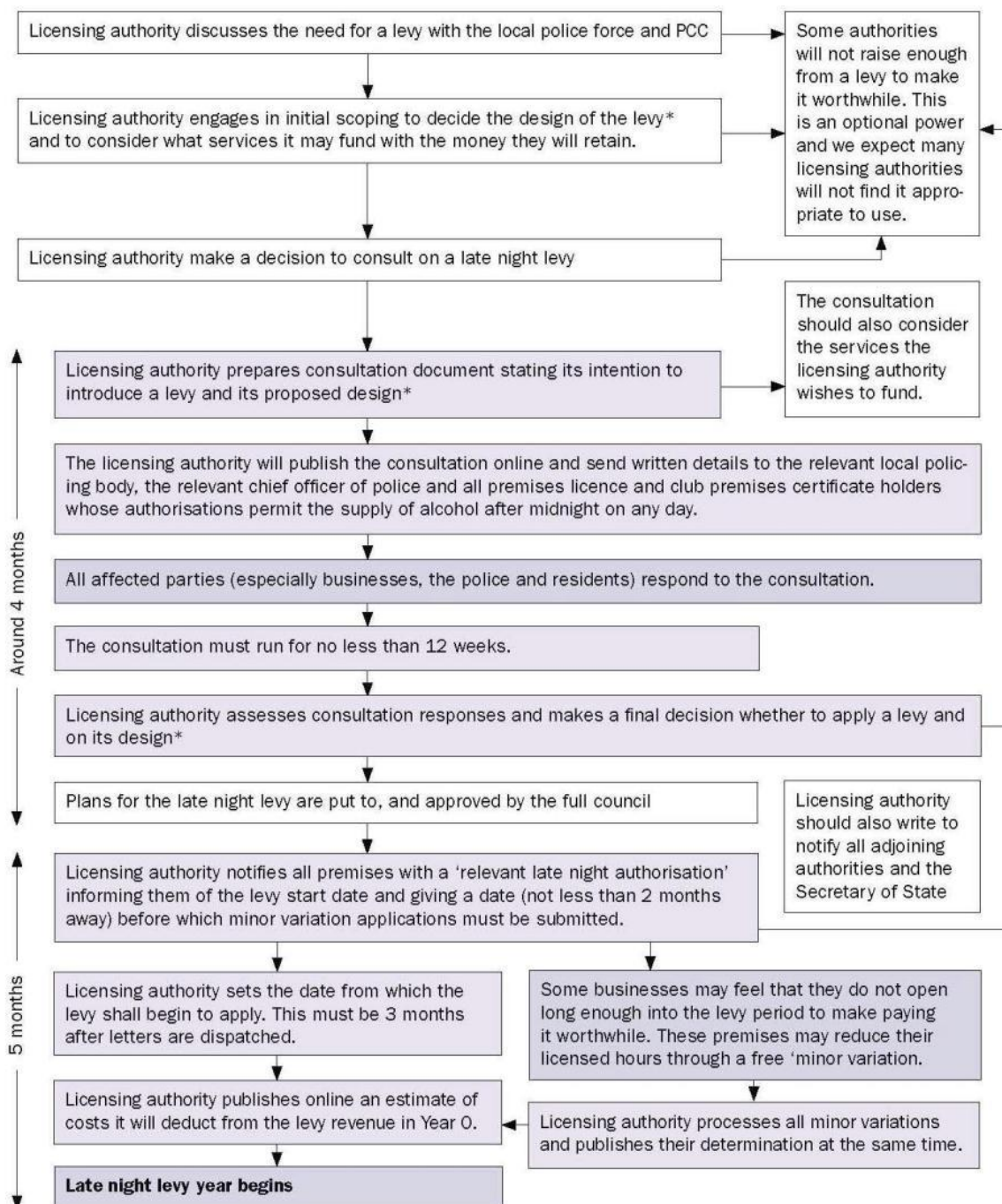
ANNEX A - EMRO PROCESS MAP

A situation arises where there is need to restrict the late night supply of alcohol in a particular area. The licensing authority can decide, possibly at the suggestion of the public or the PCC, to make an EMRO.



ANNEX B - LATE NIGHT LEVY PROCESS MAPS - (Part I - Introduction)

Essential processes which will be deductible from levy revenue	<p>'late night supply period'- This is the time period where the levy applies. The licensing authority chooses this period but it must be within the window of midnight and 6am.</p> <p>'relevant late night authorisation'- a licence or certificate which permits the supply of alcohol within the 'late night supply period'</p>
Key stages for business	<p>*The levy design - is the licensing authority's choice of the 'late night supply period', any exemptions or reductions that apply and the proportion of the revenue (after administrative costs are deducted) which the licensing authority wishes to keep to fund other activities (max 30%).</p>



ANNEX B - LATE NIGHT LEVY PROCESS MAPS CONTINUED - (Part II - Levy year)

