

**Licensing and Registration**

Civic Hall  
Leeds LS1 1UR

**Private & Confidential**

Woods Whur 2014 Limited  
Devonshire House  
38 York Place  
Leeds  
LS1 2ED

Contact: Susan Holden  
Tel: 0113 247 4095  
Fax: 0113 224 3885  
Email: susan.holden@leeds.gov.uk

12 September 2014

By email: chris@woodswhur.co.uk

Dear Mr Rees-Gay

**Ground And Lower Ground Floor, Corn Exchange, Call Lane, LS1 7BR  
Application for new premises licence – Licensing Act 2003  
Licensing Authority Letter of Representation**

Thank you for submitting your application for the above premises, received at the address above on 19<sup>th</sup> August 2014.

The area in which the subject premises is located is within a cumulative impact area. It is the council's policy, on receipt of relevant representations, to refuse new and variation applications in this area for alcohol led premises such as bars, pubs and nightclubs and for premises seeking late night refreshment such as takeaways and late opening restaurants, unless the applicant can demonstrate that their application would not impact on the cumulative effect of such licensed premises in the area.

Specifically your application falls within the red area of the City Centre CIP. As stated at 7.20 of the Statement of Licensing Policy 2014 to 2018 the council will seek to refuse all applications in these red areas on the basis that the impact on the licensing objectives are at such a level that the area cannot support any more premises opening or extending their hours no matter how impressive the concept or application is. The council will only grant applications in the red zone in exceptional cases. It will be for you to advise the council how your application would be an exceptional case.

In addition, I refer you to 7.51 to 7.53 of the Policy which describes how when considering the presumption against grant in a CIP area the council will need to be satisfied that the grant will not impact on the cumulative impact of existing licensed premises in the area.



Applicants will often suggest measures which they assert will demonstrate there will be no impact. Examples of factors the licensing authority may consider as demonstrating there will be no impact may include, though are not limited to:

- Small premises who intend to operate before midnight.
- Premises which are not alcohol led and only operate during the day time economy
- Instances where the applicant is relocating their business to a new premises but retaining the same style of business.
- Conditions which ensure that the premises will operate in a particular manner such as a minimum number of covers or waiter/waitress service to secure a food led operation.

Examples of factors the licensing authority will not consider as meeting the standard of rebuttal include:

- That the premises will be well managed and run as all licensed premises should meet this standard
- That the premises will be constructed to a high standard
- That the applicant operates similar premises elsewhere, such as in another licensing authority area, without complaint

As the licensing authority is of the opinion that your application contains insufficient information about how your application would not add to the impact already being experienced in the area, we are submitting a formal representation against your application on the grounds of:

1. Prevention of crime and disorder
2. Public nuisance.

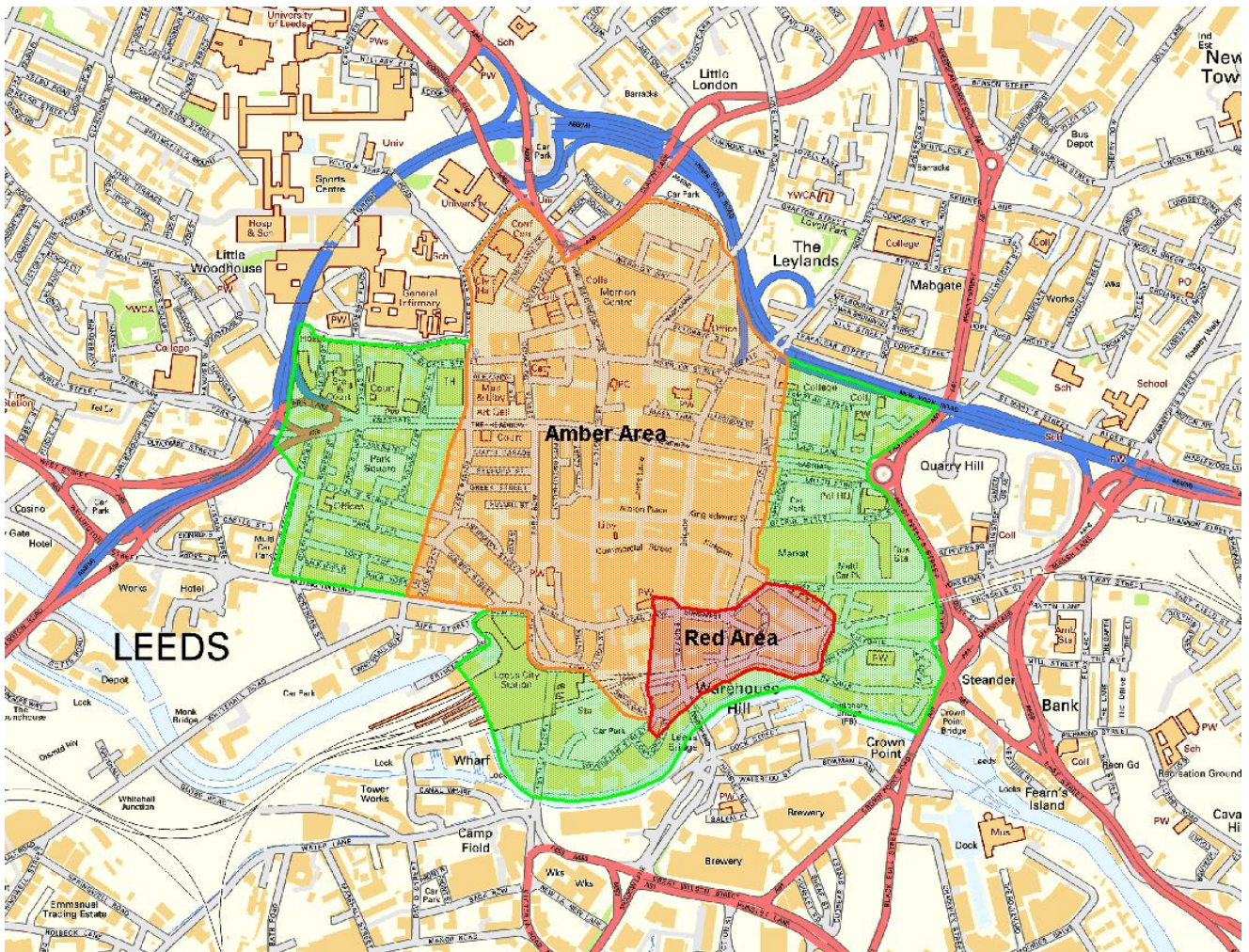
However, if you are able to explain the measures you will take to ensure that your proposed activities do not add to the impact already being experienced in the area, we may be prepared to withdraw the representation providing you agree to amend your application to incorporate those measures as conditions.

I enclose the guidance note relating to the cumulative impact policy.

Should you have any questions, please contact us.

Yours faithfully

Susan Holden  
Principal Project Officer  
Entertainment Licensing



Area 1 relates to the city centre. West Yorkshire Police have provide information that the nature of the city centre is such that the problem areas and cumulative impact is directly related to the style of businesses opening in that area and their clientele.

In addition the close proximity of a number of venues on a street can result in difficulties in identifying individual premises as causing problems which can be dealt with via an action plan or a review process.

As a consequence the closure or opening of businesses can have a dramatic effect on reported crime and reported incidents in an area. While individual premises are dealt with using the review process, there are areas in Leeds city centre which may temporarily become saturated as new businesses open or existing businesses change their style of operation.

In addition the council recognises that a previous problem area can be improved by the introduction of new styles of business types, such as food led premises, and seeks to encourage this.

This dynamic nature has created difficulties in setting a policy for the city centre that will be relevant for five years until the next formal review. Therefore the council will adopt an approach of designating areas within the city centre CIP as 'red' or 'amber' based upon an analysis of night time economy related issues that are relevant to the licensing objectives. Areas that are considered highly saturated will be designated as red areas.

The council will seek to refuse all applications in these **red areas** on the basis that the impact on the licensing objectives are at such a level that the area cannot support any more premises opening or extending their hours no matter how impressive the concept or application is. The council will only grant applications in the red zone in exceptional cases.

An **amber area** is an area which is of concern based upon an analysis of night time economy related issues that are relevant to the licensing objectives, and the council will expect applicants to offer additional measures tailored to the problems in that area.

All other areas within the city centre CIP will be designated **green areas** where good quality applications will be generally be more acceptable even though the area is a CIP area.

The current map and evidence is available on the council's website and from Entertainment Licensing.

It is the council's policy, on receipt of relevant representations, to

- refuse new and variation applications in the red area
- to seek additional measures for new and variation applications in the amber area
- To seek good quality applications for application in the green area

This applies to alcohol led premises such as bars, pubs and nightclubs, and for premises seeking late night refreshment such as takeaways and late opening restaurants.

## **West Yorkshire Police Evidence**

### **Analysis of Leeds City Centre high volume night-time economy related crime**

#### **Introduction**

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The aim of this report is to demonstrate the scale and nature of crime in the City Centre over the last few years and determine the key areas of concern.

The crimes considered for this report include:

- Thefts from person
- Thefts non specific
- Robbery
- Assault (including Affray)
- Murder/Manslaughter
- Drunk & Disorderly
- Public Order

The current Cumulative Impact Policy covers an area encompassing the entire City Centre area and this report aims to highlight smaller more significant areas for future consideration during the review process.

Data has been collated covering the last five years between 2008 and 2012 and using Cadcorp mapmodeller GIS has been mapped to determine the key areas of concern. The data for 2012 has then been examined in more detail to identify smaller zones of risk by crime type to provide a better understanding of where our risk areas are in the City by offence type.

The maps in section three and hotspots zones in section five are focussing on crimes committed in the night-time economy and not those occurring in the daytime. For the purposes of this report, the night-time economy has been defined as the period 1800 – 0600.

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## 2. Setting the Scene

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**Figure 1. All Crimes (24 hours)**

Occurrence Type	2008	2009	2010	2011	2012	Total
THEFT NON SPECIFIC	2020	1594	1885	1988	2267	9754
THEFT FROM PERSON	839	1078	1435	1820	2077	7249
ASSAULT	1126	1239	1298	1133	966	5762
DRUNK AND DISORDERLY	560	562	649	639	670	3080
PUBLIC ORDER	235	269	279	223	184	1190
ROBBERY	116	164	105	108	98	591
AFFRAY	60	61	118	73	46	358
MURDER/MANSLAUGHTER	3	2	1	1	1	8
Total	4959	4969	5770	5985	6309	27992

**Figure 2. Licensed Premises Flag Only**

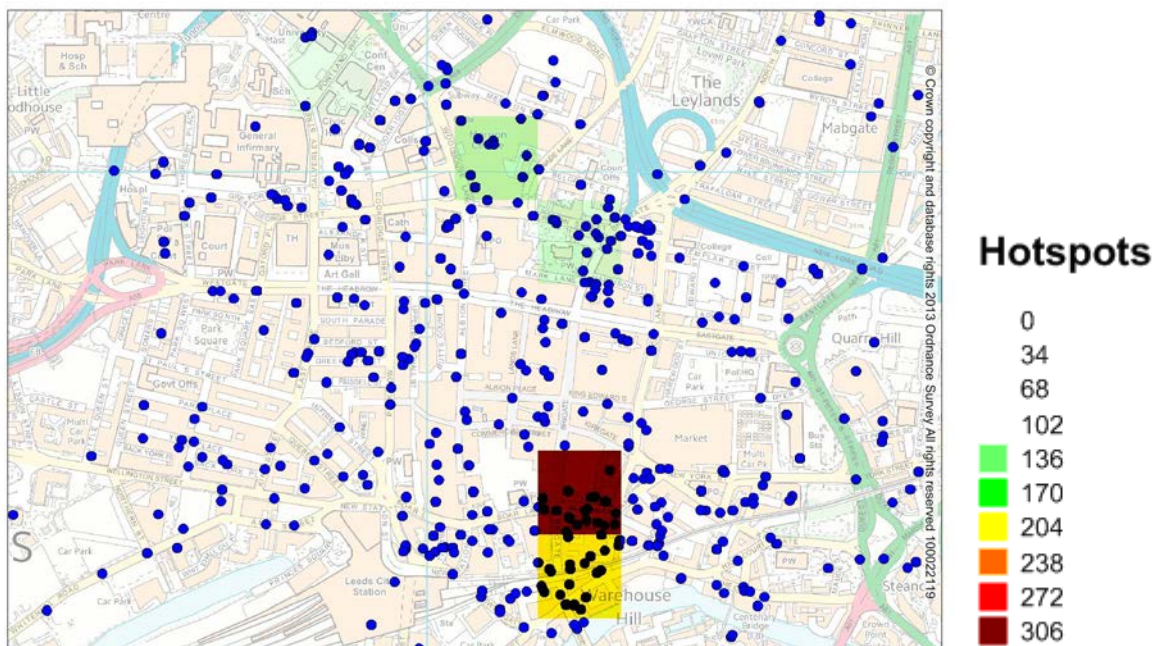
Occurrence Type	2008	2009	2010	2011	2012	Total
AFFRAY	9	6	16	9	6	46
ASSAULT	280	253	242	240	153	1168
DRUNK AND DISORDERLY	29	28	19	22	23	121
MURDER/MANSLAUGHTER		1				1
PUBLIC ORDER	16	25	15	11	5	72
ROBBERY	3	6	7	3	2	21
THEFT FROM PERSON	222	446	778	962	1133	3541
THEFT NON SPECIFIC	644	580	748	728	832	3532
Grand Total	1203	1345	1825	1975	2154	8502

**Figure 3. Alcohol Flag Only**

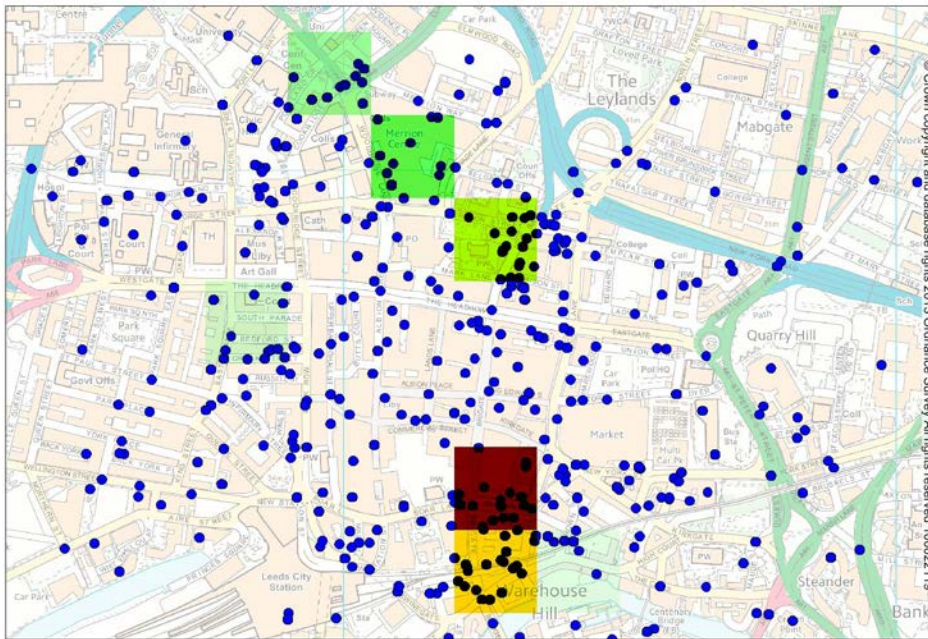
Occurrence Type	2008	2009	2010	2011	2012	Total
AFFRAY	40	44	87	45	26	242
ASSAULT	632	814	848	573	348	3215
DRUNK AND DISORDERLY	547	557	646	528	484	2762
MURDER/MANSLAUGHTER	1	2		1	1	5
PUBLIC ORDER	99	114	118	61	60	452
ROBBERY	30	48	29	15	10	132
THEFT FROM PERSON	80	109	194	137	110	630
THEFT NON SPECIFIC	92	120	140	97	69	518
Grand Total	1521	1808	2062	1457	1108	7956

**3. Geo-spatial analysis over time**

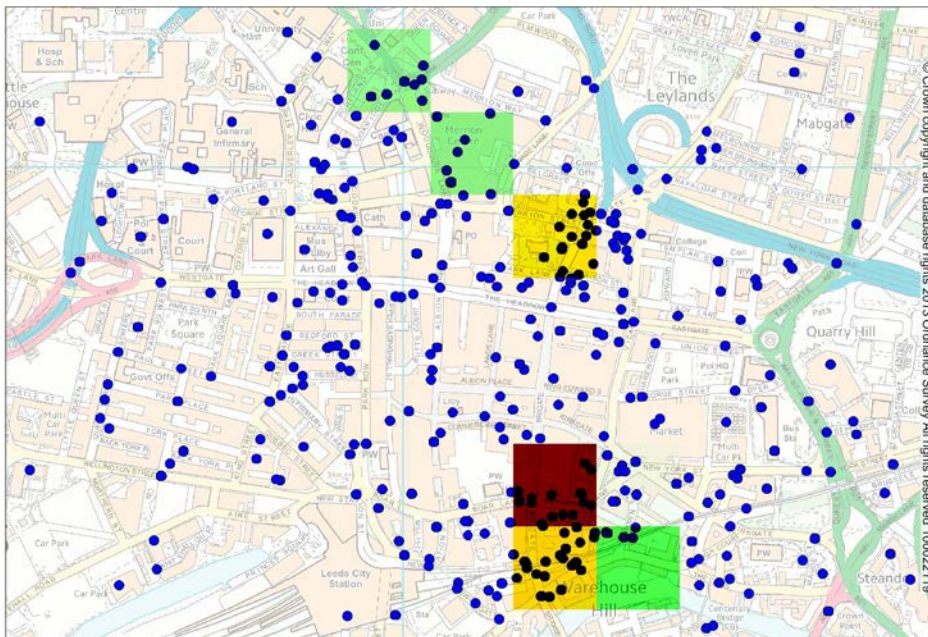
**Map 1 – 2008**



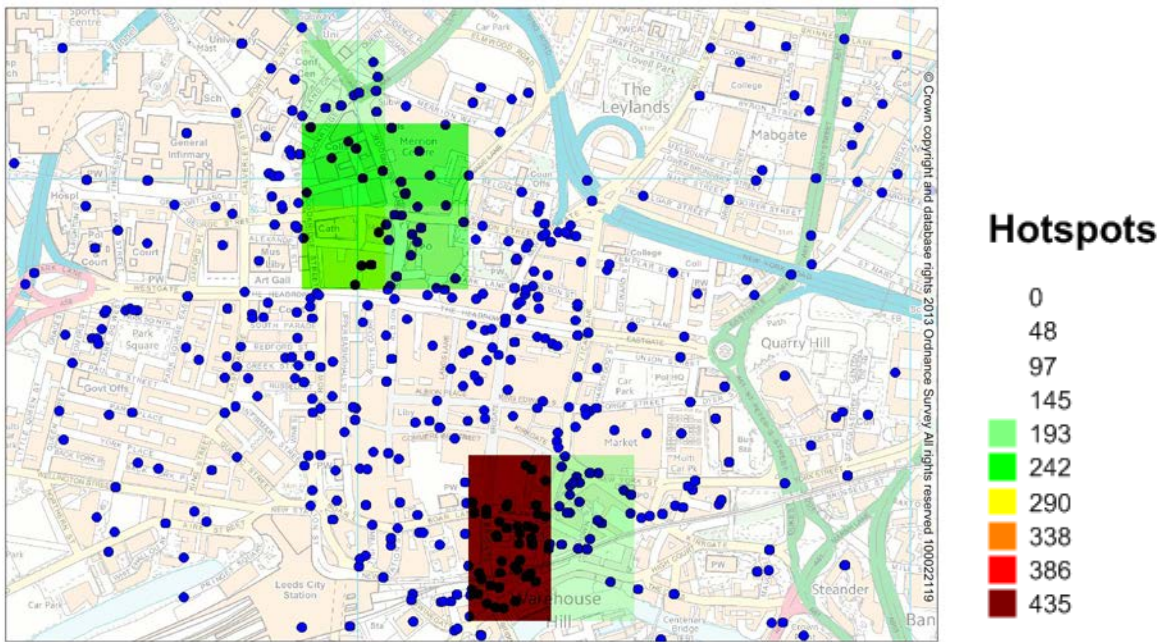
Map 2 – 2009



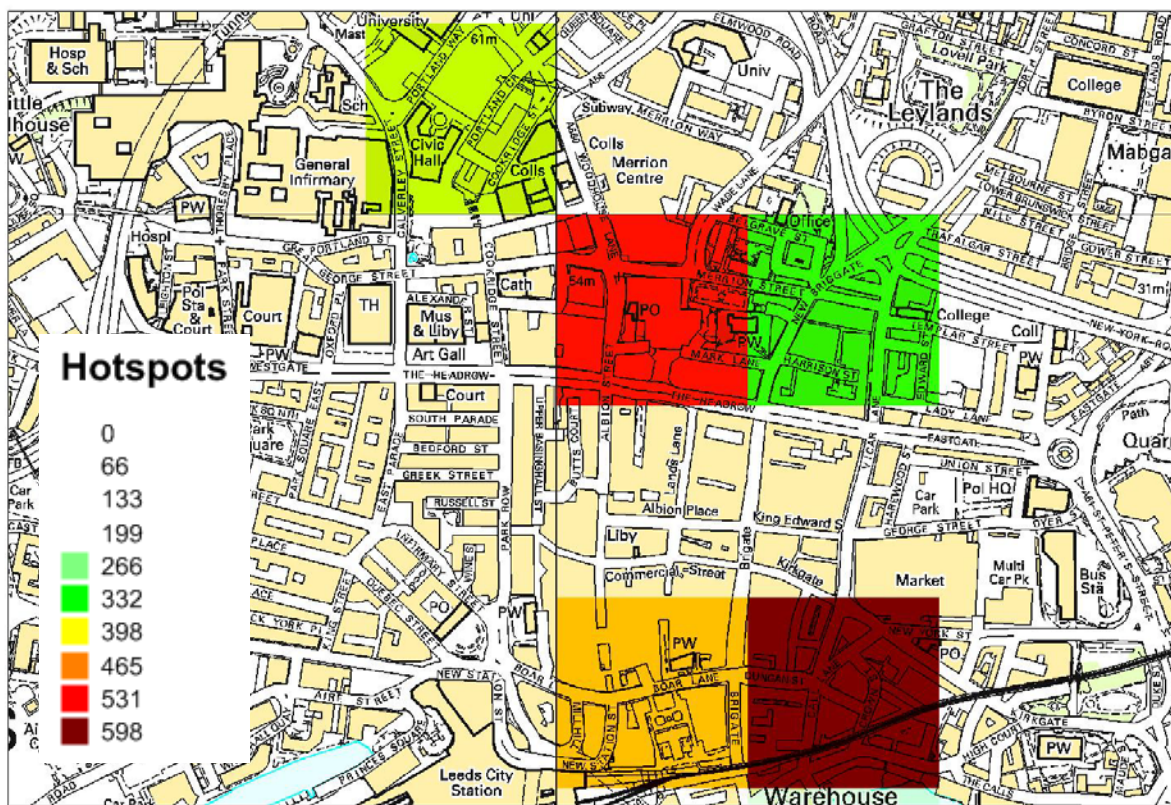
Map 3 – 2010



Map 4 – 2011



Map 5 – 2012





**Figure 4 – Top Streets over the 5 year period (night-time economy only)**

Street Name	2008	2009	2010	2011	2012	Total
CALL LANE	228	257	409	538	705	2137
BRIGGATE	338	335	370	430	581	2054
ALBION STREET	264	232	310	537	453	1796
WOODHOUSE LANE	263	296	419	408	365	1751
THE HEADROW	359	364	327	307	316	1673
COOKRIDGE STREET	113	171	182	324	247	1037
NEW BRIGGATE	127	231	310	153	201	1022
BOAR LANE	294	198	216	164	128	1000
KIRKGATE	245	233	177	151	153	959
GREAT GEORGE STREET	190	180	146	140	155	811
NEW YORK STREET	123	95	118	104	83	523
Grand Total	2544	2592	2984	3256	3387	14763

<b>Key</b>	
<span style="background-color: #ff8c00; padding: 2px;"> </span>	Top 3 Streets per year
<span style="background-color: #ffa500; padding: 2px;"> </span>	Top 10 Streets per year
<span style="background-color: #fff9c4; padding: 2px;"> </span>	Not in Top 10 Streets per year

Figure 4 is sorted by the total number of night-time economy offences occurring on specific street locations and then the colour coding represents that streets ranking for each individual year. For example, only Briggate has been in the top three each year between 2008 and 2012 but Call Lane has been top for the last three years.

#### 4. 2012 Offence Data

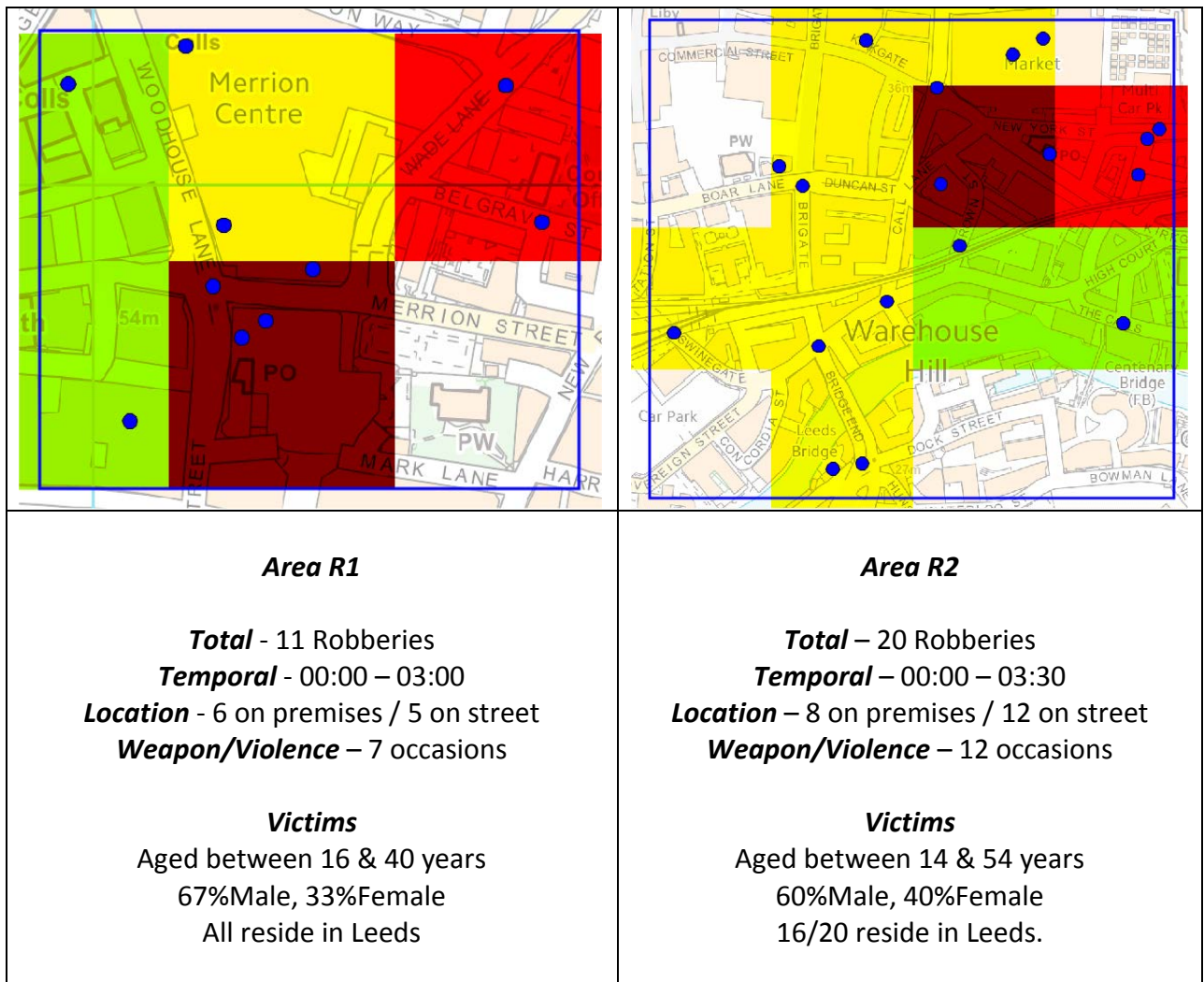
**Figure 5 – Top Offence Types by location type (night-time economy)**

Occurrence Type	Off Street	On Street	2012 Total
AFFRAY	17	21	38
ASSAULT	468	260	728
DRUNK AND DISORDERLY	259	327	586
MURDER/MANSLAUGHTER		1	1
PUBLIC ORDER	64	47	111
ROBBERY	32	35	67
THEFT FROM PERSON	1334	184	1518
THEFT NON SPECIFIC	1116	124	1240
2012 Total	3290	999	4289

It can be seen that large proportions of offences are committed off street inside a premises. Indeed, 88% of THEP and 90% of Thefts Non Specific occur inside premises. This is opposed to violent crime in which 64% occur inside a location showing that many also occur on the roadside.

## 5. Hotspots Zones in 2012 by crime type

### 5.1 Robbery

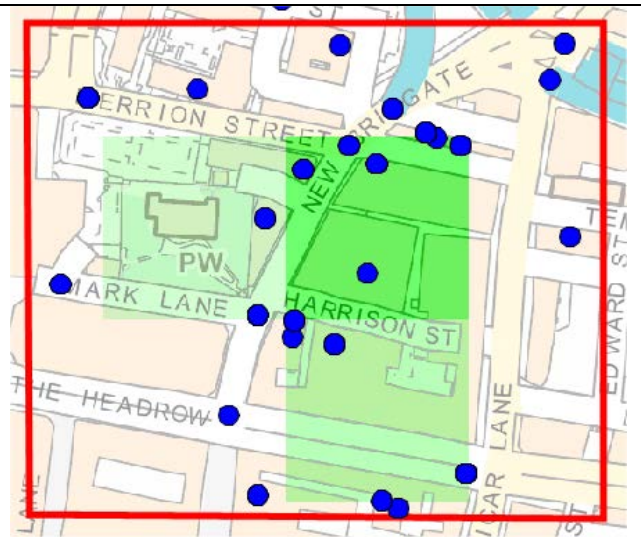


**5.2 Assault & Affray**



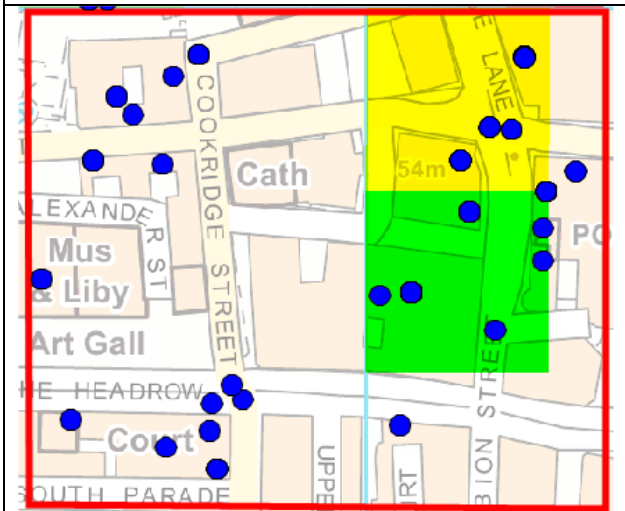
**Area A1**

**Total** – 14 Affray & 249 Assault  
**Temporal** – 00:00 – 05:00  
**Location** – 159 on premises/104 on street



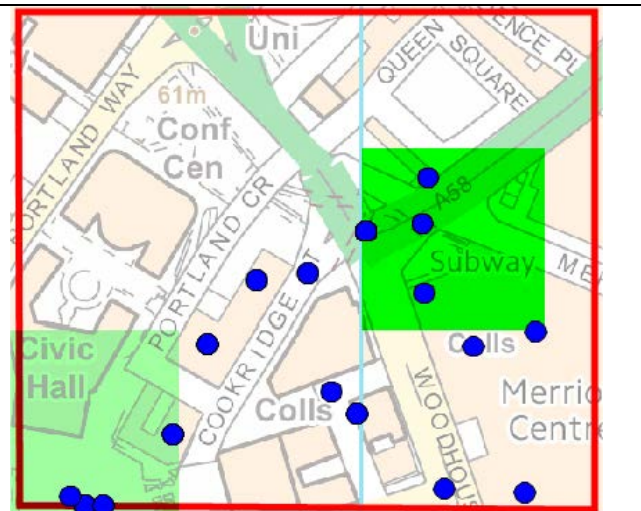
**Area A2**

**Total** – 4 Affray & 66 Assault  
**Temporal** – 01:00 – 04:00  
**Location** – 38 on premises/ 32 on street



**Area A3 lower**

**Total** – 2 Affray & 97 Assault  
**Temporal** – 00:00 - 04:00  
**Location** – 87 on premises/12 on street



**Area A3 upper**

**Total** – 3 Affray & 49 Assault  
**Temporal** – 00:00 – 0300  
**Location** – 30 on premises / 22 on street

5.3 Thefts from Person & Thefts non-specific



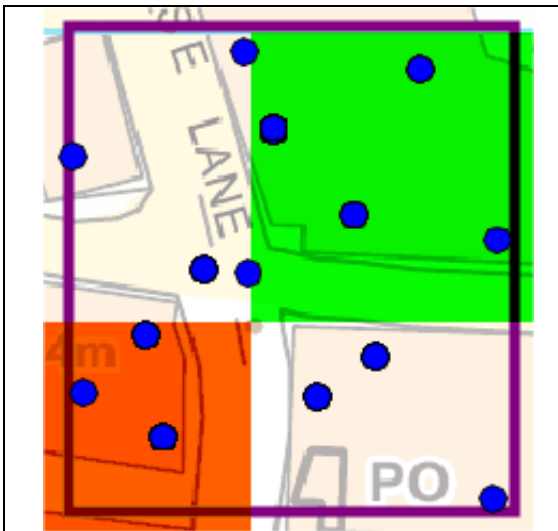
**Area T1**

**Total** – 674 THEP, 455 THEFT NON  
**Temporal** – 00:00 – 04:00  
**Location** – 1022 on premises/107street



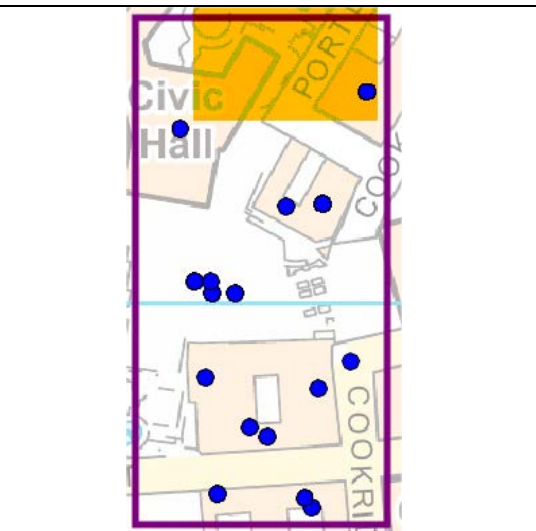
**Area T2**

**Total** – 142 THEP, 86 THEFT NON  
**Temporal** – 00:00 – 04:00  
**Location** – 216 on premis./12 on street



**Area T3**

**Total** – 120 THEP & 75 THEFT NON  
**Temporal** – 0000 – 0400  
**Location** – 189 on premises / 6 on street



**Area T4**

**Total** – 168 THEP & 72 THEFT NON  
**Temporal** – 2300 – 0300  
**Location** – 230 on premises / 10 on street

## 6. Summary and Conclusions

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- Crime\* in the City Centre of Leeds has risen year on year from 2008 to 2012, going from 4959 in 2008 to 6309 in 2012.
- Crime with a link to licensed premises has followed the same increase year on year from 2008 to 2012, going from 1203 in 2008 to 2154 in 2012.
- Of the crimes linked to licensed premises, assaults have shown reductions year on year between 2008 and 2012. Conversely, thefts especially Thefts from Person crime has risen notably over the last few years, going from 222 in 2008 to 1133 in 2012.
- The street location Briggate has been ranked in the top three streets in Leeds centre each year for committed crime in the night-time economy between 2008 and 2012 but Call Lane has been ranked at the top for the last three years consecutively.
- Albion Street, Briggate and Call Lane have been ranked in the top three for the last three years in relation to night-time economy crime.
- 88% of THEP and 90% of Thefts Non Specific occur inside premises. This is opposed to violent crime in which 64% occur inside a location showing that many assaults also occur on the roadside.
- Areas A1, A2, T1 and T2 are all focussed on the same areas and these account for the majority of night-time economy related crime. Other areas also overlap and it is these areas within section five that are recommended to be included on any Cumulative Impact Policy.

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\* Crime referred to here is defined as those offences of Theft Non Specific, Theft from Person, Assault, Affray, Drunk & Disorderly, Robbery, Public Order and Murder/Manslaughter.