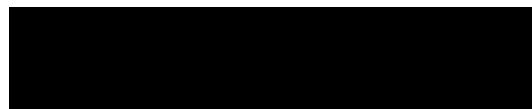


Leeds District Licensing



Department

Leeds District Licensing Department
First Floor
Elland Road DHQ
Elland Road
Leeds
LS11 8BU



15th June 2023

Graudo Foods Ltd
Unit 2 480 Harehills Lane
Leeds
LS96ng

cc. Entertainment Licensing Section. Leeds City Council, Civic Hall, Leeds. LS1 1UR

**RE: Graudo Foods 480 Harehills Lane Leeds
APPLICATION FOR A PREMISES LICENCE – LICENSING ACT 2003:
POLICE – LETTER OF REPRESENTATION – CUMULATIVE IMPACT ASSESSMENT (CIA):**

Thank you for submitting your application for the above premises.

The application relates to premises which fall within one of the areas of Leeds currently subject to a policy of cumulative impact, as detailed in the present Statement of Licensing Policy 2023-2027, issued by Leeds City Council as the licensing authority.

The area concerned in this case is **Harehills**.

Therefore, West Yorkshire Police make representations based on the cumulative impact assessment of the area concerned and highlighted above, where the licensing objectives and particularly the prevention of crime and disorder and prevention of public nuisance objectives are being adversely affected.

Leeds City Councils Statement of Licensing Policy 2023-2027 states;

“The council has assessed crime statistics for the area known as Harehills and has determined that there is an area that is suffering from the cumulative impact of off-licensed premises and consequently this is leading to problems which are undermining the licensing objectives. Specifically the area around Harehills Road and Harehills Lane is particularly suffering from the cumulative impact of too many off licences.”

NOT PROTECTIVELY MARKED

NOT PROTECTIVELY MARKED

Harehills is an area of Leeds, which is also subject to a Public Space Protection Order (PSPO), to prevent members of the public being in possession of an open container of alcohol in a public space and gives authorities powers to seize alcohol under these circumstances.

The reason behind this being, Harehills is blighted by alcohol related ASB, crime and street drinking.

I believe many street drinkers attend this area of Harehills due to the high concentration of off-licences where alcohol is readily available, and the price driven down by fierce competition.

The associated ASB and crime related to street drinking alone is public urination/defecation, littering, arguments and fights breaking out between groups, loitering down side-streets causing intimidation and foul language.

This application proposes off sales for alcohol 08:00-20:00 Monday to Saturday and 11:00-19:00 Sunday. I don't see anyway that this application would do anything other than add to the problems within the CIA which is saturated with this type of operation. In fact, within this application they seem to acknowledge there is an issue in the area by offering the condition ***"All staff from the premises shall regularly monitor the exterior of the premises in an attempt to identify persons loitering in the area who may have purchase alcohol from the premises. When identify may request to leave the area."***

The applicant suggests they ***"MAY REQUEST TO LEAVE THE AREA"***. If the applicant decides to ask someone to leave the area and they listen, where are they likely to go but elsewhere within the CIA further perpetuating the issue.

To quote again from the Statement of Licensing Policy 2023-2027;

"It would be inconsistent with the council's duty to promote the licensing objectives to grant new and variation application for any premises licence which seeks off sales and late night refreshment to operate during the peak hours described in the cumulative impact assessment for Harehills."

West Yorkshire Police are in agreement with Leeds City Council that to grant another premises licence for off sales would not be consistent with the licensing objectives and would contribute negatively to the cumulative impact of similar businesses in the area.

Therefore, West Yorkshire Police consider that this application would not be appropriate due to the current policy of cumulative impact for Harehills and make this representation to promote the licensing objectives.

PC [REDACTED] CLIFFORD
Leeds District Licensing Officer
West Yorkshire Police

NOT PROTECTIVELY MARKED

WITNESS STATEMENT

(Criminal Justice Act 1967, s.9; Magistrates' Courts Act 1980, s.5B;
Criminal Procedure Rules, r.27.2)

Ref. No:	<input type="text"/>	URN:	<input type="text"/>
Statement of:	PC <input type="text"/> Farrar		
Date of birth:	Over 18	Occupation:	Police Constable
This statement (consisting of: 3 page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.			
Signature:	Andrew Farrar	Date:	19 th June 2023
Time and date statement taken: 15:20 hours on 19 th June 2023			

Check box if witness evidence is visually recorded *(supply witness details on rear)*

I am a Police Constable in West Yorkshire Police, currently working in East Leeds, in the Neighbourhood Policing Team (NPT). I am a Police Constable responsible for the Gipton & Harehills ward from an NPT perspective.

I am making the following representations against licence application PREM/05121/001 at Graudo Foods, 480 Harehills Lane, Leeds, due to the impact this will have on exacerbating the street drinking problem in Harehills, and undermine the work done by the NPT to tackle this issue.

'Street drinking' and 'street drinkers' are the terms used to describe those who publicly consume large amounts of alcohol throughout the day and engage in antisocial behaviour. Many street drinkers are alcoholics, and often homeless and battling other addictions. Street drinking is part of a routine for these people, who meet in groups on the street and public places and consume large amounts of often cheap and easily available alcohol.

These street drinkers are often a focal point for antisocial behaviour. The groups are intimidating to members of the public, and frequently become loud and rowdy as they become increasingly intoxicated. Fights between people in the group are not uncommon, and neither is drinking to point of unconsciousness. Harassment of passers-by and aggressive begging is commonplace. This occurs throughout the day, during what would be considered normal working hours, when businesses are open, and members of the public are going about their daily business.

Street drinkers are a particular problem in the Harehills area. Street drinkers are frequently raised as one of the key concerns by residents to the police, and tackling street drinkers is one of the key priorities for the NPT which is highlighted from the local community.

The NPT have an open problem solving incident on police systems to assess the scale of the problem, record those involved, and document steps taken to address the issue. This started in December 2021, and in the 13 months since its creation over 100 different street drinkers have been recorded against it. These individuals are not all local to Harehills, with some travelling from elsewhere in Leeds to meet their associates and display their

Signature:

Signature witnessed by:

NICHE Ref. No:		URN:	
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Continuation Statement of

alcoholism on the streets of Harehills. Individuals from Meanwood, Burmantofts, South Leeds, and even Wetherby have been dealt with in Harehills in relation to street drinking by officers.

The impact of this issue cannot be overstated. Data produced by West Yorkshire Police shows that in the year December 2021 to December 2022 over just eight streets in Harehills the Police received 59 calls relating to alcohol nuisance. Examples of these reports include:

WYP-20220409-0591 - Caller reporting group of males drinking and causing noise nuisance.

WYP-20220502-1369 - Caller reporting female in drink, causing noise nuisance singing the same song for the last 20 minutes and holding a bottle of wine.

WYP-20220620-0138 - Street drinkers, drinking, shouting, and urinating on the street.

WYP-20220805-1537 - Male walking around threatening people with a glass beer bottle in his hands.

WYP-20221015-1626 - Large group of adult males in back street drinking/in drink, shouting, swearing and fighting amongst themselves.

WYP-20220131-0823 - Call from a business owner large group of males and females in drink outside the premise, shouting, drinking and being abusive.

It is important to note that these are only the calls logged as alcohol nuisance and does not include those further reports which have been logged as various criminal offences, for which the total will be much higher.

The NPT have worked tirelessly to tackle this issue. Many of those involved have been reported to Court for various offences and breaches of closure orders and public space protection orders, and officers routinely patrol the key sites to disrupt and move on those involved.

The biggest challenge in tackling this issue is the availability of cheap alcohol in the area.

The area around off-licences become the focal points for the street drinkers. Work done by the NPT and partner agencies is undermined by businesses continuing to sell alcohol to those involved, which perpetuates the problem.

Street drinkers will move between off-licences, buying from one until the issues cause them to be moved on and a temporary ban by the staff, before this is relaxed after a period of respite when they have been elsewhere.

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Continuation Statement of

However well-intentioned a business is, if they are selling alcohol which is appropriately priced for the demographic of the area, it will be in the sights of the street drinkers. Alcoholism is an addiction and Harehills is well-known as a ripe hunting ground.

Other applications have included proposed conditions such as a minimum sale of £5, and restricting the hours during which alcohol can be sold. These are ineffective at tackling the problem. Street drinkers will often buy alcohol in sufficient quantity to exceed a minimum sale tariff or include small groceries to meet this threshold. Restricting the hours during which alcohol can be sold is irrelevant, as the street drinking is not usually a problem late in the evening, with data showing peak call demand to the police regarding street drinkers is between 1000hrs to 1200hrs and 1500hrs to 2100hrs.

In recent weeks, NPT along with HMRC and Trading Standards have carried out inspections on several licensed premises in the Harehills area of Leeds. These visits have identified the sale of non-duty paid alcohol and illicit cigarettes. Over two lorry loads of alcohol has been seized as a result, compounding the effect that cheap alcohol is for sale in Harehills, and licenced premises are not following the correct regulations.

In the absence of any meaningful conditions which can be imposed, should a further licence be granted in Harehills this will continue to attract street drinkers to the locality and aggravate the issues that the NPT are trying to tackle.

Signature:

Signature Witnessed by: